

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

\* \* \*

SAUNDRA S. RUSSELL : CIVIL ACTION  
KEITH SADOWSKI :  
WILLIAM CAMPBELL, :  
Plaintiffs :

vs. :

CITY OF PHILADELPHIA : NO. 3151-cv-13  
COMMISSIONER CHARLES S. RAMSEY :  
PHILADELPHIA POLICE DEPARTMENT :  
In his individual and official :  
capacity :  
and :

DEPUTY COMMISSIONER KEVIN BETHEL :  
PHILADELPHIA POLICE DEPARTMENT :  
In his individual and official :  
capacity :  
and :

DEPUTY COMMISSIONER WILLIAM :  
BLACKBURN PHILADELPHIA POLICE :  
DEPARTMENT :  
In his individual and official :  
capacity :  
and :

CAPTAIN WILLIAM BROADBENT, :  
(RETIRED) :  
PHILADELPHIA POLICE DEPARTMENT :  
In his individual and official :  
capacity :  
and :

INSPECTOR JAMES KELLY :  
PHILADELPHIA POLICE DEPARTMENT :  
In his individual and official :  
capacity :  
and :

CAPTAIN MELVIN SINGLETON, :  
PHILADELPHIA POLICE DEPARTMENT :  
In his individual and official :  
capacity :

1  
2 LIEUTENANT THOMAS HYERS, :  
(RETIRED)  
3 PHILADELPHIA POLICE DEPARTMENT :  
In his individual and official :  
4 capacity :  
and :  
5  
6 LIEUTENANT JACK FEINMAN, :  
(RETIRED)  
7 PHILADELPHIA POLICE DEPARTMENT :  
In his individual and official :  
8 capacity :  
and :  
9  
10 LIEUTENANT EDWARD SPANGLER, :  
(RETIRED)  
11 PHILADELPHIA POLICE DEPARTMENT :  
In his individual and official :  
12 capacity :  
and :  
13  
14 LIEUTENANT CHARLES GREEN :  
PHILADELPHIA POLICE DEPARTMENT :  
In his individual and official :  
15 capacity :  
and :  
16  
17 LIEUTENANT LAVERNE VANN :  
PHILADELPHIA POLICE DEPARTMENT :  
In his individual and official :  
18 capacity :  
and :  
19  
20 INSPECTOR AARON HORNE :  
PHILADELPHIA POLICE DEPARTMENT :  
In his individual and official :  
21 capacity :  
and :  
22  
23 CARROLL MADDEN :  
OCCUPATIONAL SAFETY :  
ADMINISTRATOR :  
24 PHILADELPHIA POLICE DEPARTMENT :  
In her individual and official :  
capacity :

## APPEARANCES:

1  
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3  
4 HERBERT McDUFFY, JR., ESQUIRE  
200 Campbell Drive, Suite 246  
Willingboro, NJ 08046  
5 -- Representing the Plaintiff  
6  
7

8 TOI SHIELDS, ESQUIRE  
CITY OF PHILADELPHIA LAW DEPARTMENT  
9 One Parkway Building  
1515 Arch Street, 16th Floor  
10 Philadelphia, PA 19102  
-- Representing the Defendants  
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1 \* \* \*  
2 Oral deposition of SAUNDRA RUSSELL,  
3 taken at the CITY OF PHILADELPHIA LAW DEPARTMENT, One  
4 Parkway Building, 1515 Arch Street, 15th Floor,  
5 Philadelphia, Pennsylvania 19102, beginning at 1:55  
6 p.m., on Friday, August 15, 2014, before Alice T.  
7 Mattes, Court Reporter and Notary Public, there being  
8 present:  
9

10 \* \* \*  
11 PRECISION REPORTING, INC.  
12 230 South Broad Street - Suite 302  
Philadelphia, PA 19102  
(215) 731-9847  
13 1-800-528-3060  
1134 Parliament Way  
14 Thorofare, NJ 08086  
(856) 848-4978  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1 \* \* \*  
2 (It is hereby stipulated by and  
3 between counsel for the respective  
4 parties that signing, sealing, filing and  
5 certification are waived; and that all  
6 objections, except as to the form of the  
7 questions, be reserved until the time of  
8 trial.)  
9

10 \* \* \*  
11 SAUNDRA RUSSELL,  
12 after having been first duly sworn, was  
13 examined and testified as follows:  
14

## EXAMINATION

15 \* \* \*  
16 BY MS. SHIELDS:

17 Q Good afternoon, Miss Russell.  
18 A Yes.

19 Q I'm Toi Shields, and I am representing the  
20 City of Philadelphia and twelve named defendants --  
21 A Um-hmm.

22 Q -- in an action brought by you and two other  
23 co-plaintiffs, Mr. Sadowski and Mr. Campbell.

24 A Yes, ma'am.

1 Q Let's go over some instructions for the  
2 deposition just so we get a clear record.

3 A Yes.

4 Q You have to give verbal responses to my  
5 questions, because the court reporter, as wonderful  
6 as she is, cannot take down a nod of the head or,  
7 you know, uh-huh or maybe or um-hmm, doesn't really  
8 do it. Let's let each other finish before we speak.

9 Let me get my question out and then I'll let you get  
10 your response out. If you don't understand a  
11 question, I'll be glad to clarify it or repeat it.  
12 If you need a break we'll finish up that question  
13 and then we'll break.

14 A Okay.

15 Q You know, so if you need a break, please let  
16 me know.

17 A Okay.

18 Q Have you ever been deposed before?

19 A Yes.

20 Q In connection with what matter have you been  
21 deposed before?

22 A Well, I've been deposed in the police  
23 department on your side. And I've also been deposed  
24 for an auto accident.

1 Q Let me just finish asking you this. Do you  
2 have any mental or physical conditions right now  
3 that would prevent you from answering clearly and  
4 truthfully?

5 A No.

6 Q You feel fine now?

7 A Yes.

8 Q Okay. Let's go back to cases that you  
9 testified or were deposed in regarding your tenure  
10 when you were a police officer. Do you remember  
11 those cases?

12 A No. It was -- Lynne Sitarski, she  
13 had a case, I remember, because she wrote a letter  
14 about professionalism in court.

15 Q Okay.

16 A I can't recall the other ones, ma'am.

17 Q Okay. Your educational background, where  
18 did you go to high school?

19 A Cardinal Dougherty High School.

20 Q And did you go to college?

21 A Yes. I just recently started  
22 college. Penn State. I started Penn State in 2010  
23 online and I'm taking up psychology. And a minor in  
24 sociology.

1 Q Let's go to your employment history with the  
2 Philadelphia Police Department.

3 A Yes.

4 Q When did you join the Philadelphia Police  
5 Department?

6 A April 5th, 1999.

7 Q And what district were you assigned to in  
8 1999?

9 A The 25th District.

10 Q And for what length of time or what period  
11 of time did you work in the 25th District, do you  
12 remember?

13 A I started out in the 25th District in  
14 2 Platoon, I was in 2A. Approximately a year later  
15 Captain Nestel asked me to come and work for him in  
16 his Five Squad, because of my activity, you know,  
17 while working in the field. I was there for  
18 approximately a year. That's when the inspector,  
19 Inspector Carl Holmes, asked me to come and work for  
20 him in the East Task Force because of my work in the  
21 field.

22 Q And this was at the 25th District?

23 A Yes. So I worked for -- I worked in  
24 2A in the 25th District, I worked in 5 Platoon,

1 which is directly for the captain, and then I worked  
2 directly for East -- I was in the East Task Force,  
3 worked directly for the inspector.

4 Q And what were your duties in the 25th  
5 District?

6 A My duties in the 25th District when I  
7 was in 2A was to answer radio calls and to also be  
8 proactive as an officer to look for -- to follow  
9 crime patterns.

10 Q Um-hmm.

11 A And to, you know, go out and look for  
12 people who the detectives have given us information  
13 about for warrants.

14 Q And did there come a time when you  
15 transferred to the 23rd District?

16 A Yes. I was promoted in March of  
17 2004. I believe it was March of 2004, yes. And I  
18 was transferred to the 23rd District. In the 23rd  
19 District I was assigned to 2C Platoon. After being  
20 there for a couple of weeks the captain asked me to  
21 come and work for her because of my activity in the  
22 field.

23 Q What captain was this in the 23rd District?

24 A Sharon Seaborough.

1 Q And when you say your activities in the  
2 field, what do you mean by that?

3 A I was a person that cleaned up the  
4 community. I ensured that the community was treated  
5 fairly. And by ensuring that the community is  
6 treated fairly, I went out and stopped crime.

7 Q And we're in the 23rd District now, because  
8 your complaint goes over --

9 A Um-hmm.

10 Q -- a few assignments over a period of years.  
11 So I'm going to take --

12 A Yes.

13 Q -- each one.

14 A Okay.

15 Q Okay? So we have at least a clear record.

16 A Yes.

17 Q So we're in the 23rd District. And, also,  
18 what were your duties and responsibilities in the  
19 23rd District?

20 A In 2A my job was as -- I was a  
21 platoon sergeant. I cannot remember the amount of  
22 officers that I had under my command at the time,  
23 but I was supposed to ensure that I monitored my  
24 officers and to ensure that they patrolled their

1 sectors effectively and that they treated the  
2 community with the level of services that they  
3 deserve.

4 Q And who were your direct supervisors when  
5 you were in the 23rd District?

6 A I had McCullum. Lieutenant McCullum  
7 was my direct lieutenant.

8 Q Do you have a first name?

9 A That's what I was thinking about.  
10 His nephew's name is Bob McCullum.

11 Q Don't worry about it.

12 A Okay. There's two of 'em on the  
13 department, two McCullums. So I didn't want to get  
14 them mixed up. But that particular lieutenant was  
15 two -- two days after making sergeant he took me to  
16 roll call with him and he told my subordinates that  
17 I was not there to supervise them, that I was only  
18 there to follow directions under his lead and that I  
19 could not do anything to them without his approval  
20 and that he could take my stripes because they were  
21 Velcro.

22 Q Okay. You're getting ahead of me.

23 A Oh, okay.

24 Q That's okay. We're going to get to that.

1 A Okay.

2 Q Now, Lieutenant McCullum, what race is he?

3 A He's a black male.

4 Q Okay. What racial discrimination, if any,  
5 did you experience when you were in the 23rd  
6 District?

7 A I didn't experience any -- only by  
8 Lieutenant Hyers, he called me a girl and basically  
9 stated, you know -- I don't know if you want me to  
10 tell you that now.

11 Q Go ahead.

12 A He stated, Girl, you wouldn't be back  
13 here at 5 Squad if it wasn't for that lady upstairs.  
14 Referring to the black captain, Sharon Seaborough.

15 Q When did Lieutenant Hyers say that to you?  
16 Do you remember?

17 A It was right before I was being --  
18 when I was told that I was being transferred to the  
19 Narcotics Strike Force, it was -- it was around that  
20 time. But everything happened so fast, because he  
21 got there and I wasn't there that long before I  
22 left. But I know it was in the timeframe basically  
23 of when he first got there up until I went to the  
24 Strike Force, which was only a matter of months,

1 ma'am.

2 Q Okay. Let's go back to Lieutenant McCullum.  
3 You testified that he made statements about you in  
4 roll call --

5 A Yes.

6 Q -- in front of other officers.

7 A Yes.

8 Q Explain that for me, please.

9 A My first day in the 23rd District I  
10 had an officer, Floyd Richardson, he showed up two  
11 hours late for work. I asked him where he was, and  
12 he told me that he was a boxer and that the  
13 lieutenant and the captain knew why he didn't come  
14 to work on time. Lieutenant McCullum was not there.  
15 When the captain came downstairs I asked her if, you  
16 know, this officer, how should I carry him on the  
17 DAR, which is our daily attendance report, because  
18 he said he was two hours late and she knew about it.  
19 She stated, he's lying, and I want him on a foot  
20 beat for 30 days. I was the messenger and I went to  
21 Officer Richardson and told him what the captain had  
22 stated. He never got to work early. When the day  
23 that the lieutenant came back he was at work early  
24 and told the lieutenant that I had put him on a

1 30-day foot beat. It wasn't by me. So the  
2 lieutenant never spoke to me. He walked past me.  
3 And when I went to roll call that's when he told  
4 them that I could not do anything to them and that  
5 my stripes was Velcro and he could take them,  
6 because I was on probation.

7 Q Who else, if anyone, discriminated against  
8 you because of your gender or your sex?

9 A Well, that was Lieutenant Hyers. So  
10 the captain asked me to go to 5 Platoon. I never  
11 asked the captain. She assigned me there, because I  
12 did go out and officers that weren't performing, I  
13 was showing them this is how you have -- you can't  
14 have people standing on the corners. People are  
15 coming home from work, they don't want to feel  
16 insecure going into their doors. I did a great job  
17 doing that. The captain observed that. She decided  
18 to put me in 5 Platoon.

19 Q Okay. Miss Russell, did you tell anybody  
20 about the comments that Lieutenant McCullum made?

21 A Yes, I told the captain.

22 Q And what did you tell the captain, that he  
23 made those comments in roll call?

24 A Yes. I didn't tell her. Someone

1 else told her. And she called me on the phone while  
2 I was on my day off and asked me what's going on  
3 with you and Lieutenant McCullum. I explained to  
4 her what happened. She screamed, what? She called  
5 myself -- I'm sorry, she called Lieutenant McCullum,  
6 she was there. I don't know if it was anybody else.  
7 But I know I was there. And she told him that he  
8 did not have a right to do that, and he actually  
9 apologized for doing it.

10 Q Now, the statements that Lieutenant Hyers  
11 made, you testified just a moment ago that he called  
12 you a girl.

13 A Yes. Lieutenant McCullum went to  
14 Lieutenant Hyers and told him that -- I got  
15 promoted, ma'am, with -- I had just -- I think I had  
16 like four and a half or five years on the job, which  
17 was unknown of at the time. People just didn't get  
18 promoted with that amount of years on the job. So  
19 they basically said, Lieutenant McCullum and other  
20 officers, including other sergeants, including  
21 Lieutenant Kemchuck (ph), who was a sergeant at the  
22 time with me, they didn't think that I had a right  
23 to go to 5 Platoon.

24 Q Okay. Let me just finish my question.

1 When Lieutenant Hyers made a comment  
2 to you or called you a girl, what did you do? Did  
3 you complain to anybody --

4 A Yes.

5 MR McDUFFY: You got to wait till she  
6 finishes the question.

7 THE WITNESS: Oh, yeah. I understand.

8 MR McDUFFY: Just --

9 THE WITNESS: Okay, I understand.

10 MR McDUFFY: -- give it a chance.

11 BY MS. SHIELDS:

12 Q You're doing okay.

13 A Okay.

14 Q Did you complain to anyone about his comment  
15 to you?

16 A Yes.

17 Q To whom did you complain?

18 A Captain Seaborough.

19 Q And what did she do, if anything?

20 A She said that she would speak to him  
21 about it.

22 Q Do you know if she followed up and spoke to  
23 him about the comment?

24 A No.

1 Q Did you go to the EO Division of IAD?

2 A No.

3 Q Okay. Let's go to the Narcotics Strike  
4 Force.

5 A Yes.

6 Q How did you come to work or get assigned to  
7 the Narcotics Strike Force?

8 A Well -- okay, while being assigned to  
9 5 Platoon Captain Singleton -- I'm sorry, Captain  
10 Seaborough sent me to United Way for a community  
11 gathering for issues that were going on in the  
12 neighborhoods. So when I got there Commissioner  
13 Johnson was there.

14 Q Um-hmm.

15 A Commission Johnson was very familiar  
16 with my work ethics, because he would -- he said he  
17 would be in the 25th District and he would actually  
18 see me out there cleaning up the streets in the 25th  
19 District. So he knew how hard I worked when I was  
20 out there.

21 He asked me, he says, you've been in  
22 the 25th District, he said, you're really a hard  
23 worker out there. I hear you on the radio all the  
24 time. He says, where do you want to go?

Q And what did you say in response to his question about where you wanted to go, or be assigned, rather?

A Well, no, that was -- yeah, he says, where did I want to go. And I told him, I said, I don't know, I said, maybe I would like to go to Highway Patrol or Narcotics Strike Force. No, I just said narcotics. And I just left it at that.

Q And what rank were you when you finally -- let me back up by saying strike that.

Take me through the next steps of how you got notified of your assignment to Narcotics Strike Force. I apologize for the question.

A Okay.

Q Or the way it was posed.

A He asked me.

Q Who's "he"?

A I'm sorry. Commissioner Johnson asked me where did I want to go.

Q Sylvester Johnson?

A Sylvester Johnson, yes. Commissioner Sylvester Johnson asked me where did I want to go. I gave him the options. Approximately maybe a month or two, I can't remember the timeframe, but it

A My duties were to ensure that all surveillances were conducted properly and legally and to ensure that the paperwork when a surveillance officer does a surveillance, there is a PARS report that is generated from that officer and that PARS report is assigned to another officer. We have a wheel of officers who would put all of the discovery together. And that would include them generating a 75-49, which is the actual arrest report that would go to court with them. So in narcotics is you go from the actual surveillance all the way through court with the paperwork. My job was to read that entire -- all of the paperwork and ensure that there were no misspelled words and that the story corroborated with the PARS report.

Q Now, did you have any prior experience in the field of narcotics before your assignment there?

A Well, the 25th District, and matter of fact, the East Division, is a very drug-infested area. So the majority of the narcotics cases come from East Division where I was assigned as an officer.

Q And who were your supervisors at the Narcotics Strike Force?

wasn't a long time in between, I received a phone call from the Commissioner's office stating that I was going to be transferred to Narcotics Strike Force. But I received this phone call after being called into headquarters. I was told to take headquarters immediately. When I got in people was saying, you're going to be transferred, you're going to be transferred. That's when I got to the office with Lieutenant Hyers and he told me that I was transferred to the Narcotics Strike Force. But then I got a phone call after that telling me to report to Narcotics Strike Force the next day at 8 o'clock or something.

Q And can you give me a time period that you served in the Narcotics Strike Force?

A Yes. I was assigned to Narcotics Strike Force in February of 2005. And I was reassigned to Citywide Vice in I think it was about maybe February of 2007.

Q And at this time what rank were you in the Narcotics Strike Force?

A I was a sergeant.

Q And what were your duties as a sergeant in the Narcotics Strike Force?

A I didn't know who my supervisor was for quite a few weeks.

Q And why is that?

A I don't know. When I came to the Narcotics Strike Force, the first day that I got there I was told to sit in the operations room. I'm getting ready to tell you. I was told by the corporal. I don't remember who the corporal was at the time. But I was told to sit in the operations room. The corporal then brought me into his office and I sat there. I got there at 8 o'clock. I didn't see anyone until about 11:00. At that time Lieutenant Haag came out and said --

Q Haag?

A Haag, H-A-A-G.

Q Okay.

A He came out and asked me what was I doing there. And I told him that I was assigned there, that the Commissioner's office, as well as my supervisors, had assigned me to the Narcotics Strike Force. He told me, I don't think so. I don't know anything of you coming. I have to go and get that checked out for you.

Q Okay. Who was the captain of the Narcotics

1 Strike Force at this time?

2 A It was Captain Broadbent, William  
3 Broadbent.

4 Q Okay. And did Lieutenant Haag go and check  
5 out whether or not you were validly assigned to the  
6 Narcotics Strike Force?

7 A Apparently so. Because not too long  
8 after that Captain Broadbent brought me into his  
9 office.

10 Q Is that the same day?

11 A Yes.

12 Q Okay. I'm sorry, continue.

13 A He brought me into his office and  
14 stated that, you know, they just found out that I  
15 was being assigned there and that the chief, which  
16 was Chief -- there's so many names. Keith Sadler.  
17 Keith Sadler. That he wanted to see me in his  
18 office.

19 Q Was his office in the Narcotics Strike  
20 Force?

21 A It wasn't in that building. It was  
22 in Building 110, which was in the arsenal on that  
23 base.

24 Q Okay. And what happened next? You met with

1 Q So what did you do next? What happened next  
2 at the --

3 A Yeah, his aide told me that he was a  
4 little bit tired of Keith Sadler, which was the  
5 chief, bringing people over and he couldn't bring  
6 his own people over. I left that office. By that  
7 time Chief Sadler was coming in and he said, hey,  
8 Sandra, and he walked me back to his office, which  
9 was across the hall from Inspector Sullivan's  
10 office. And I told him, I said, you never told  
11 these people that, you know, I was coming here. And  
12 he said, I don't have to tell them anything, this is  
13 my building. He said, I told Broadbent, or  
14 whatever, I told them that you were coming. And  
15 that's what it came to.

16 Q So did there come a time when you got an  
17 assignment of duties in the Narcotics Strike Force?

18 A Weeks after me being there. I sat in  
19 the supervisor's office by myself for weeks. No one  
20 talked to me, no one said anything to me. I didn't  
21 know where the bathroom was.

22 Q Okay. Did --

23 A And -- okay.

24 Q No, finish your statement, then I'll ask my

1 Chief Sadler or Keith Sadler?

2 A Yes. Chief Keith Sadler.

3 Q What happened at that meeting?

4 A I went over -- first, I'm sorry, let  
5 me strike. They wanted me to see the inspector. I  
6 didn't mean to say Keith Sadler. They wanted me to  
7 see the inspector, which was Inspector Sullivan.  
8 But Chief Sadler was in the building.

9 Q Okay.

10 A When I got there the inspector was on  
11 the telephone, which I'm referring to Inspector  
12 Sullivan. He was on the telephone. And I was  
13 instructed to wait with his aide at the time. I  
14 cannot remember the aide's name.

15 While sitting there waiting, the  
16 inspector didn't look too happy for me to be there.  
17 After he got off the phone he looked and he just  
18 didn't appear happy for me to be there. So I looked  
19 at his aide and I said, you know, what did I do?  
20 You know, he doesn't -- they told me to come over  
21 here and speak to him, but he doesn't seem too, you  
22 know, interested. He told me, I have to get back to  
23 you because I have a issue that I have to deal with  
24 with my son.

1 question.

2 A While waiting in the office one day I  
3 heard, which I now identified a voice as Sergeant  
4 Haag's. It was a radio room right next to the  
5 sergeant's office. And I heard him say, did you  
6 hear about the new sergeant? He basically said,  
7 yeah, Spanky, he's gonna basically take care of me,  
8 'cause he's going to put me in Spangler's squad.  
9 She might have got here easy, but she's not going to  
10 have a easy way while she's here, is exactly what  
11 they said.

12 Q And let's clarify this. You overheard who  
13 say this to who?

14 A I don't know who the other person  
15 was, but I identified the voice later as Sergeant  
16 Haag -- I mean, as Sergeant Hayes, H-A-Y-E-S.

17 Q Do you have a first name?

18 A No, ma'am. I can't remember their  
19 first names. It's been so many years.

20 Q Was it a male or a female?

21 A It was a white male.

22 Q And when you heard this comment,  
23 Miss Russell, did you go to anybody about it?

24 A No, ma'am. I was so afraid. I don't

1 know anybody there. Who was I supposed to tell? I  
 2 knew nobody, especially when Lieutenant Hyers told  
 3 me before I walked out of his office that I didn't  
 4 deserve to be in Narcotics Strike Force and that he  
 5 was going to contact Spanky. I didn't know who  
 6 Spanky was. 'Cause that was his friend, and I  
 7 didn't deserve to be there. Ma'am, I moved up on  
 8 that job by myself as a black female.

9 Q Did you go back to --

10 A Excuse me.

11 Q Do you want to take a break?

12 A No, I'm good, ma'am. I'm sorry.

13 Q Don't be sorry.

14 Did you go back to Commissioner  
 15 Johnson?

16 A No. I didn't go back to Commissioner  
 17 Johnson. I was thankful that Commissioner Johnson  
 18 had put me there. And I felt like I was a strong  
 19 person, that I would be able to deal with it. I was  
 20 going to ignore them and pray about it and hope that  
 21 things would get better.

22 Q So what happened next in the Narcotics  
 23 Strike Force with regard to you getting a permanent  
 24 assignment in this division?

1 don't want you here. I said, well, can you show me  
 2 where the bathroom is. And she showed me where the  
 3 bathroom is and the locker, which I hadn't been  
 4 assigned a locker or anything. And then I went to  
 5 roll call and I stood there.

6 Q I'm just going to ask you a very basic  
 7 question. If you didn't know where the bathroom is,  
 8 how did you go to the bathroom during the day?

9 A I didn't.

10 Q All day?

11 A I didn't, ma'am. I know. I didn't  
 12 go. I was so afraid after -- I was the only -- I  
 13 was the only black female there at the time. There  
 14 was only one other black supervisor there, which I  
 15 don't have to just relate to black people. But, I  
 16 mean, I got people walking past me that don't speak  
 17 to me and leave me in a office all day long. I was  
 18 afraid to walk out of the office.

19 Q What were you afraid of?

20 A Ma'am, I just was -- after Sergeant  
 21 Hayes made that statement that they were setting it  
 22 up for me when I first came there, after me being  
 23 there for a couple days, after them -- I mean, after  
 24 going over to the inspector's office and them saying

1 A Well, like I said, I stayed in the  
 2 office for some time. And then this one day I was  
 3 out getting something to drink and they -- prior to  
 4 that I was sitting -- this is what happened. I was  
 5 getting something to drink. I came and I sat down  
 6 to someone that I knew before I came on the job. He  
 7 was an officer. He was injured. As I was talking  
 8 to him another officer called on the phone. Her  
 9 name is Donna Stewart. She worked with me at the  
 10 25th District. I could hear her conversation  
 11 telling Tony, did you hear that she -- that she was  
 12 assigned to D Platoon, speaking of me. Tony asked  
 13 who she was speaking to. She said, Sandra Russell,  
 14 she's assigned to D Platoon. She's gonna come here  
 15 and act like this is highway patrol and not  
 16 narcotics, because she's so worried about cleaning  
 17 up the corners. Well, that's what narcotics does,  
 18 they clear corners.

19 Q Um-hmm.

20 A So I hear someone call for roll call.  
 21 I didn't know where I was assigned. Another young  
 22 lady, Renee Jeffcoat said, why do you never come to  
 23 roll call? I said, because nobody ever told me  
 24 where I was assigned. She said, that's because they

1 that, you know, he can't bring his own people over  
 2 there, after me sitting out in the -- in the  
 3 operations room and making me look stupid, like I  
 4 just one day just said, you know what, I'm not gonna  
 5 go to the 23rd District, I'm just gonna show up at  
 6 Narcotics Strike Force and say that that's where I'm  
 7 assigned. It doesn't make sense.

8 Q Okay. So did there come a time,  
 9 Miss Russell, where you did get squared away in  
 10 connection with an assignment and some clear-cut  
 11 duties?

12 A Yes.

13 Q Okay. When did that happen?

14 A The day that I went to roll call  
 15 Lieutenant Feinman called me to his office and he  
 16 told me, I'm your lieutenant. He said, your call  
 17 sign is Nathan 107, you get a radio that you keep  
 18 with you, and your call sign will correspond with  
 19 the car, the radio patrol car. So that's at Nathan  
 20 107 as well. And he basically -- that was basically  
 21 it, that I can recall of that conversation.

22 Q So Lieutenant Jack Feinman was your --

23 A Spangler.

24 Q Spangler was your supervisor?



1 A He was my first supervisor.  
 2 Q Supervisor.  
 3 A That's the one who told me about  
 4 Nathan 107. I hope that's what I said.  
 5 Q I think you said Feinman.  
 6 A Oh, I'm sorry. Spangler. It's just  
 7 so many supervisors.  
 8 Q No, take your time.  
 9 So this was Lieutenant Spangler.  
 10 A Yes.  
 11 Q Okay. So he was your supervisor at this  
 12 particular time.  
 13 A Yes.  
 14 Q And what were your duties?  
 15 A My duties were to ensure that --  
 16 well, he didn't tell me what my duties were. I  
 17 basically was trained by Sergeant Lackman. He's the  
 18 one that showed me what I was supposed to do, and  
 19 that was basically to ensure that the surveillance  
 20 officers were conducting the investigations  
 21 properly, and as I stated, about the paperwork, what  
 22 I was supposed to do for the paperwork. And also to  
 23 ensure that the 75-68s were signed and the 75-49's  
 24 were conducted properly.

1 Q With regard to let's take any racial  
 2 discrimination. Who, if anyone, engaged in any  
 3 conduct or comment that were racially offensive  
 4 while you were in the Narcotics Strike Force?  
 5 That's a mouthful.  
 6 A It is. We just say NSF.  
 7 Q NSF. That's how we will then refer to it.  
 8 A Yes, NSF. On May 14th of 2005 I had  
 9 to come in late that day. I forget, or maybe I went  
 10 to the doctor or something. But I told the  
 11 lieutenant that I would be late that day.  
 12 Let me go back to May 13th. On  
 13 May 13th of 2005 Lieutenant Spangler came to me and  
 14 told me that the next day that all of the officers  
 15 that were bike trained were to ride their bikes,  
 16 which included some officers that was directly  
 17 assigned to me, which included Officer Eric Dial.  
 18 Eric -- I told Officer Dial, as well as all of my  
 19 subordinates, that they would have to ride their  
 20 bikes the next day. Officer Dial told me that he  
 21 was not riding his bike. He had an issue with  
 22 Lieutenant Spangler from prior before I got there,  
 23 because Lieutenant Spangler apparently dismissed him  
 24 from the bike squad and put him in the line squad,

1 which are the officers that ride the vehicles.  
 2 I told him, it doesn't matter. You  
 3 basically -- this is what the commander is saying  
 4 and this is now my directive to you. Once he gives  
 5 me a directive, it's my directive to tell you to  
 6 ride your bike.  
 7 I come in late that day. When I  
 8 come in Eric had not -- he didn't ride his bike at  
 9 all. Lieutenant Spangler told me, I need you to  
 10 talk to Eric, he still did not ride his bike. No  
 11 problem. We get back to headquarters. When we get  
 12 back to headquarters I had -- I'll tell you that in  
 13 a minute.  
 14 Okay, we get back to headquarters  
 15 and when we get back, I call Officer Dial in the  
 16 office. But I don't like to talk to a subordinate  
 17 without someone else there present. Lieutenant  
 18 Smith, I can't remember his first name either, he  
 19 was in the office. I brought Eric in and I told  
 20 Eric, you did not ride your bike, you are not in --  
 21 you are not cooperating with what we're trying to do  
 22 in the squad and you were definitely defiant toward  
 23 lieutenant's orders, as well as my orders. Eric, I  
 24 asked him again, why didn't he ride his bike. Eric

1 basically shrugged it off, I didn't want to. When  
 2 he left the office as I was closing the door, it  
 3 wasn't closed all the way, the lieutenant was  
 4 sitting in the far end of the office like here and I  
 5 was at the door there. I heard Eric Dial state,  
 6 that fucking cunt, she has the nerve to tell me  
 7 about riding my bike. As much as I do, this, that,  
 8 and the other. He said some other things in between  
 9 that I can't recall at this time. And he called me  
 10 a bitch. Ma'am, I will not lie. I wanted to open  
 11 that door and say something to him. But I knew as a  
 12 professional that I could not at that time. I told  
 13 Lieutenant Smith, I said, did you hear him?  
 14 Lieutenant Smith said, no, I didn't hear him. I  
 15 told Lieutenant Smith what he said.  
 16 I went home that day and I wrote a  
 17 memorandum immediately to discipline him. That was  
 18 on a Saturday. We're off Sunday and Monday. When I  
 19 came back on Tuesday, which was the 16th, I believe,  
 20 I went to Lieutenant Spangler and told him what Eric  
 21 had done. He said, okay, bring him in the office,  
 22 no problem. When I brought him in the office I said  
 23 to him, I said, Eric, I heard you call me a cunt and  
 24 a bitch. I said, you are disrespectful. Forget

1 this uniform, but you are disrespectful to me as a  
2 woman and as a mother, because the word cunt has  
3 nothing feminine about it at all. I said, you would  
4 call me something like that? I said that's a... So  
5 he told me --

6 Q Who's "he"?

7 A Sorry, ma'am. It's like you re-live  
8 it all over again.

9 Eric Dial stated, yeah, you might  
10 hear me, I might have said something like that,  
11 yeah. Matter of fact, I said it. You know, I can  
12 just be an asshole sometimes and say things like  
13 that. And he basically admitted it in front of me  
14 and the lieutenant. And I told the lieutenant, I'm  
15 taking him to the front. Meaning, I'm going to  
16 discipline him. Eric left the office. The next  
17 thing you know, the lieutenant forwarded it to the  
18 captain. Captain Broadbent said it wasn't bad  
19 enough. He didn't think it was that bad what he  
20 called me.

21 Q Did you meet with Captain Broadbent about  
22 it?

23 A Yes. I met with Captain Broadbent  
24 about it and asked him was he going to discipline

1 him.

2 Q When did you meet with Captain Broadbent  
3 about it?

4 A It was not too long after it  
5 happened.

6 Q Do you need a moment?

7 A No. 'Cause I just re-live it every  
8 day, ma'am. No.

9 Q Let's take a break.

10 \* \* \*

11 (Whereupon, a short break was taken.)

12 \* \* \*

13 BY MS. SHIELDS:

14 Q So you met with Captain Broadbent with Eric  
15 Dial present, correct?

16 A No. I met with Lieutenant Spangler  
17 with Eric Dial present.

18 Q Okay. So then you went to Captain  
19 Broadbent.

20 A He called me to him to ask me exactly  
21 what happened.

22 Q Okay. And then what happened in this  
23 meeting with Captain Broadbent?

24 A It was very brief. He just asked me

1 what happened, I told him, and he said okay.

2 Q Did you present the memo to Captain  
3 Spangler?

4 A Yes, that day.

5 Q And Captain Spangler sent it through the  
6 chain of command to Captain Broadbent?

7 A Yes.

8 Q And what happened next in connection with  
9 this incident with Eric Dial?

10 A Well, I kept inquiring about when the  
11 interviewing process would come. And that's when I  
12 was told that the captain didn't think that it was  
13 that bad what Eric had said.

14 Q And did anything else happen at the  
15 Narcotics Strike Force that would be considered sex  
16 discrimination?

17 A Well, when Commissioner Johnson, I  
18 think it was August 24th of -- I can't remember if  
19 it was 2005 or 2006, but I know it was in August of  
20 one of those years. He came and then Inspector  
21 Boyle was then assigned as the inspector over  
22 narcotics. And they were basically getting rid of  
23 the dead weight, they call it, people who weren't  
24 producing enough activity in the Strike Force and

1 anybody who had disciplinary infractions. At that  
2 time they told me that they were going to go forward  
3 with Eric Dial's paperwork. Again, no interviews,  
4 nothing happened. I continually inquired about it  
5 often, when is something going to be done. Because  
6 when Eric got away with that, basically he got  
7 away -- I mean, it took so long for them to  
8 discipline him. I was the laughing stock of the  
9 unit. I had officers, Officer Donna Stewart one day  
10 I was coming out of the sergeant's office and she  
11 just basically said, what are we going to do to F  
12 with Sergeant Russell today? It was consistent  
13 insubordination at that time.

14 Q This is Sergeant Donna Stewart?

15 A She's now a sergeant. At the time  
16 she was my officer.

17 Q And what race is Donna Stewart?

18 A She's a white female.

19 Q And did she say that directly to you?

20 A No. But I was standing there when  
21 she said it to another officer.

22 Q And what other conduct or comments were made  
23 to you that you would say either were discriminatory  
24 based on your sex? Let's take sex, any other

1 incidents that you could think of?

2 A Well, I was the only female  
3 supervisor in the Narcotics Strike Force that was a  
4 sergeant, that was able to go out on the field. So  
5 I was basically the only person. And I remember  
6 Lieutenant Spangler giving me details that he called  
7 me the rookie and I was the only person that can now  
8 do these details, because, you know, whatever  
9 reason, you know. It was like I was consistently  
10 picked on because of -- I know it was because of my  
11 gender.

12 Q Any other conduct or --

13 A Oh, yes.

14 MR McDUFFY: Wait.

15 THE WITNESS: Oh, no, no, no. Oh, I  
16 wasn't finished and then you started. Okay.

17 BY MS. SHIELDS:

18 Q Okay. Then you finish and then...

19 A Right.

20 Q Go ahead.

21 A Okay. Also 'cause you asked me what  
22 other comments. I was called Shanaynay and  
23 Sheneneh.

24 Q Who called you that?

1 if a male officer -- a supervisor walked up to  
2 another male and said to them come on, man, you  
3 know, you got to shave, you know. You coming in  
4 here looking like that? I've heard this. I went to  
5 the same officer and said, you know, you can't go  
6 out on the street like that. I was a bitch. It's  
7 totally different for a female supervisor in the  
8 Philadelphia Police Department. The men can say  
9 things that the females can't say.

10 Q Now, the derogatory term or the term  
11 Shanaynay or Sheneneh, that would be based on your  
12 race?

13 A Yes. And it couldn't have been based  
14 on my articulation. It couldn't have been based on  
15 my intelligence. My mother gave me a designer  
16 education before she bought me designer clothes. So  
17 it couldn't have been based on that, ma'am. It  
18 could not have been. I rose through the ranks too  
19 fast. They wanted to know how this little black  
20 girl rose through the -- I didn't have any college  
21 education. I didn't have any time on the job to  
22 give me credits. And these people had been on the  
23 job for fifteen years and I was sitting in the  
24 lieutenant's class with them. Because I did do my

1 A Jeannie Spicer.

2 Q And what is her race?

3 A She's a white female.

4 Q And what was her rank?

5 A She was a officer. Donna Stewart  
6 called me that.

7 Q Called you what?

8 A Shanaynay and Sheneneh.

9 Q To your face?

10 A I was standing there and heard them  
11 saying it, ma'am.

12 Q How many times and what was the frequency of  
13 them calling you Shanaynay and Sheneneh?

14 A It was often. Any time I had to  
15 correct them with something, I was, oh, Shanaynay  
16 said to do this, or Sheneneh, you know, here comes  
17 Sheneneh. And it was just -- and the other white  
18 supervisors would laugh at it. They would laugh  
19 about it when it happened.

20 Q Would this happen every day, Miss Russell?

21 A It wasn't every day, ma'am. But it  
22 was enough a week for it to consistently happen.  
23 Any time I would -- I would -- when you say in  
24 reference to my gender, any time I told an officer

1 job, because I do know the policies and the  
2 procedures of the Philadelphia Police Department.  
3 I'm such a menace to society, but why am I going to  
4 all of these places?

5 Q Now, who else made any references to your  
6 race in connection with your job?

7 A Do you mean just not in the Strike  
8 Force?

9 Q No. Let's just focus on the Strike Force.

10 A That was basically it. And Jeannie  
11 Spicer called me -- there was an incident that  
12 occurred. We were in South Philadelphia. And the  
13 surveillance was over and I went over the air and  
14 told them to take -- I'm sorry, take their secondary  
15 assignment. The secondary assignment means to go to  
16 headquarters. When I got back to headquarters  
17 Jeannie wasn't there. I looked all over for  
18 Jeannie. I went to Sergeant Lackman. I said  
19 Sergeant Lackman, where is Jeannie? He said,  
20 Jeannie left. He said, she came in the office and  
21 looked and she left. I went to Lieutenant Spangler.  
22 I said Lieutenant Spangler, where's Jeannie? He  
23 told me he didn't know. I went to her partner,  
24 Officer -- I don't want to get his name wrong, but I

1 know his name is Dimitrios. I went to him and I  
2 asked him where Jeannie was. He told me Jeannie was  
3 in the bathroom. Came back to him 15 minutes later.  
4 Jeannie's upstairs in the bike room. They had me  
5 going all around the building looking for Jeannie  
6 and they knew Jeannie was gone.

7 All of a sudden Lieutenant Spangler  
8 comes out and asks Dimitrios, where's Jeannie?  
9 Dimitrios said something to him in his ear and he  
10 backed up away from the seat and was like, I don't  
11 even want to know. He went back into his office.  
12 All of the supervisors left, and I was the only one  
13 there by myself. Jeannie calls on the phone, and I  
14 had told Sergeant Lackman, I said, I'm going to have  
15 to carry her AWOL, because she left and I didn't  
16 know where her -- if she could have -- she could  
17 have gotten hurt somewhere, I would not have known.  
18 She left without my permission. Someone told  
19 Jeannie this. She calls the phone in the Narcotics  
20 Strike Force and tells me you cannot carry me AWOL.  
21 I'm coming back. I said, Jeannie, you cannot come  
22 back to work, because it's past our working hours  
23 now. It is 12 o'clock. So in order to ensure that  
24 I did the proper thing, I got a police radio check,

1 which gives you the time stamp. It was after 12  
2 o'clock. Jeannie could hear it, but I also gave her  
3 the time stamp and said do not come into work. I'm  
4 typing on the S and R. Jeannie walks up next to me  
5 abruptly and states, I'm back. Now you can't carry  
6 me AWOL. I told her, Jeannie, you have to go home.  
7 I did not tell you to come back here. I thought she  
8 left.

9 I go to walk past the lieutenant's  
10 office, Jeannie is standing in the lieutenant's  
11 office where she is not authorized to be. I said,  
12 Jeannie, I thought I told you to go home, we can  
13 discuss this tomorrow. But right now I need you to  
14 go home. Jeannie kept continually talking. I put  
15 my hand up, I said, Jeannie, please, leave the  
16 office. When she walked past me, her shoulder  
17 brushed my hand. Didn't think anything about it. I  
18 smell her breath. Her breath is reeking with  
19 alcohol. I told her, Jeannie, you have to go, but  
20 do not drive. Because I wasn't gonna send an  
21 officer out there with alcohol on her breath. I  
22 went into the office to contact the lieutenant and  
23 to get someone to drive her home. Jeannie leaves  
24 out of the back door and kicks the door open and

1 says, that fucking black bitch. I go back to look  
2 out the window, because I didn't want her to drive.  
3 As I'm going back, her boyfriend Charlie Capuziak  
4 and now federally indicted Officer Michael Spicer,  
5 who is her brother, were standing there. They told  
6 me that I should leave Jeannie alone because she's a  
7 hard working officer and that she was only at the  
8 bar with them getting a couple of drinks. And  
9 Officer Switzer was also standing there, too. I  
10 can't think of his first name. But he was the one  
11 that was involved in the racial stickers in the  
12 lockers.

13 They left. I told them to leave the  
14 building, because they had no right to be back  
15 there. As I'm walking out to ensure that the other  
16 door is locked, I can hear through the windows in  
17 the roll call room, the windows are up, they are out  
18 there calling me all kind of racial names, Sheneneh,  
19 Shanaynay, come downstairs you black bitch, I'll F  
20 you up. And then Officer Switzer said, yeah, a  
21 black bitch is what she is, you got that right.

22 I told them to leave. Officer  
23 Cudahy went downstairs and told them, yo, guys, you  
24 better leave, she can call somebody. I can hear him

1 out of the window stating this. He gets them back  
2 to their car, he comes back upstairs.

3 The next day I come into work. Oh,  
4 I'm sorry, I called the commander of the -- that was  
5 covering the 15th District, that commander happened  
6 to be in the 25th that day. I called him and told  
7 him what had happened. So I would make sure that I  
8 documented it. Tried to call Lieutenant Spangler,  
9 couldn't get him on the phone at all. As I left --  
10 do you want me to continue?

11 Q Continue.

12 A Okay. As I left the building and I  
13 went home, I saw Officer Spicer turning down Bridge  
14 Street. I was nervous, because I know they had  
15 stated they were going to do things. But he didn't  
16 follow me. I get home. Next day I come back into  
17 work I tell them, tell Lieutenant Spangler what  
18 transpired. He tells me, oh, yeah, Jeannie called  
19 me last night and told me. I said, well,  
20 Lieutenant, I was trying to call you too to tell you  
21 what happened, but you never returned my call. But  
22 you spoke to the subordinate?

23 Q What day was this? Then I will let you  
24 continue. I'm trying to get a timeframe on this.

1 A This was in December of 2006, I  
2 believe.

3 Q Continue.

4 A Or maybe 2005. I got to look at my  
5 paperwork, ma'am. It's been a while. But it was in  
6 December.

7 Q So you're talking to --

8 A Lieutenant Spangler. And I'm telling  
9 him what happened. He's just sitting there with a  
10 smirk on his face. So I give him the paperwork,  
11 because that night I went home and wrote it up. I  
12 brought it in to Lieutenant Spangler to give it to  
13 him.

14 Q And what happened after you -- did you write  
15 a memo?

16 A Wrote a memorandum for formal  
17 disciplinary action against Jeannie Spicer for that  
18 evening.

19 Q And what happened to that? Was it a formal  
20 memo, right?

21 A Yes, ma'am.

22 Q And you gave it to Lieutenant Edward  
23 Spangler?

24 A Yes.

1 Q -- what does that mean?

2 A The formal disciplinary paperwork  
3 through the chain of command. It would go through  
4 Lieutenant Spangler. I gave it to him. He would  
5 send it to Captain Broadbent. He would send it to  
6 then Inspector Aaron Horne, and then to Chief  
7 Blackburn.

8 Q And, to your knowledge, you just testified  
9 that nothing happened --

10 A Nothing happened.

11 Q -- in connection with the Jeannie Spicer  
12 incident.

13 A Yes. And going a little forward,  
14 this is really quick. When it was time for me to  
15 get promoted, Inspector Aaron Horne contacted me and  
16 asked me if I still wanted to go through with  
17 Jeannie Spicer's incident. And I told him yes. And  
18 he told me, well, if you go through with it, they're  
19 not going to promote you.

20 Q And what was your response to Inspector  
21 Horne?

22 A I told Inspector Horne, well, I work  
23 too hard to get promoted. I mean, ma'am, I had a  
24 decision of should I punish this person for

1 Q And what happened when you gave him the  
2 memo?

3 A He took the memo and approximately 15  
4 minutes later he brought me into -- we had two  
5 lieutenant's offices. He brought me into the  
6 lieutenant's office where Lieutenant Doris was.  
7 That was his assigned office. And he told me --

8 Q Doris or Daris?

9 A D-O-R-I-S.

10 Q Okay. Continue.

11 A He told me that Jeannie told him that  
12 I hit her and that if I take her to the front she's  
13 going to say that I hit her. I told him, I did not  
14 hit her and I'm going to take her to the front.  
15 Because why would she only tell this if I'm going to  
16 punish her? If I hit her, she should be making a  
17 complaint against me that I hit her. He told me, I  
18 don't know. I sent the paperwork through. Again,  
19 ma'am, nothing. No type of discipline whatsoever.

20 Q Let me clarify your statement or ask you to  
21 clarify your statement.

22 When you say you sent the paperwork  
23 through --

24 A Yes.

1 something that happened over a year or so ago, or  
2 should I get promoted to the rank that I work for?  
3 I mean, I'm in a bad situation here.

4 Q So then what did you do?

5 A I got promoted.

6 Q Okay. In connection with -- are there any  
7 other incidents or any incidents or conduct by  
8 anybody at NSF that created a hostile work  
9 environment for you?

10 A Yes.

11 Q Tell me about those --

12 A Captain Kelly. I went to him and  
13 asked him could I --

14 Q When did Captain Kelly become a commander of  
15 NSF?

16 A Captain Kelly came in December of  
17 2006 when Lieutenant -- Captain Broadbent left. I  
18 went to Captain Kelly -- no, I'm sorry. Captain  
19 Kelly first called me into his office.

20 Q When?

21 A When he first got there.

22 Q Okay.

23 A He was there for approximately two  
24 weeks. And he told me, what's going on. You know,

1 I was bombarded by all of the supervisors here  
 2 stating that, you know, your officers are saying  
 3 that you're basically like hounding them about going  
 4 out and producing on the street, like getting --  
 5 making sure -- they cannot -- they couldn't sit  
 6 around with me as a supervisor, basically. I did  
 7 not allow my officers to leave out of roll call --  
 8 first of all, I didn't allow them to have roll call  
 9 at 9 o'clock when it was supposed to be at 8  
 10 o'clock.

11 Q I'll let you continue.

12 A Okay.

13 Q But I wanted to clarify something.  
 14 Who were your direct reports? Or  
 15 who were your officers that reported to you?

16 A I had approximately ten officers  
 17 under my command. But when Captain Kelly was  
 18 promoted Sergeant Presbyorker (ph) who is now  
 19 Lieutenant Presbyorker, he was also promoted to  
 20 lieutenant. And Sergeant Lackman (ph) left and was  
 21 transferred to Neighborhood Services. So now I had  
 22 the entire squad under my command by myself as a  
 23 sergeant.

24 Q And how many officers?

1 A Approximately almost thirty. And the  
 2 span of control is less than thirty, of course, for  
 3 a sergeant, especially doing the sensitive work,  
 4 such as narcotic surveillances.

5 Q And there were no other sergeants there?

6 A There were other sergeants there, but  
 7 they refused to take another sergeant from another  
 8 squad to put in my squad to help me out. And when  
 9 other sergeants were assigned to the unit they were  
 10 not placed in my squad either. And those particular  
 11 sergeants that came after me, they were given an  
 12 assignment as soon as they came, not two weeks  
 13 later.

14 I asked Captain Kelly, why are all  
 15 of these other supervisors coming but I'm working by  
 16 myself and you're putting them in squads where they  
 17 have almost a full complement of supervisors?

18 Q Were you the only African-American --

19 A At that time I was the only  
 20 African-American supervisor in the narcotic bureau  
 21 in the city. Not just the Strike Force, in the  
 22 bureau.

23 Q In the complaint you also -- and we'll get  
 24 back to Captain Kelly. But you also make an

1 allegation against an Officer Laverne Vann.

2 A She was -- she came back to the  
 3 Strike Force. She was there and she was basically  
 4 the same thing that happened to me happened to her.  
 5 She was discriminated upon and she was put out of  
 6 the strike force. She won her arbitration and she  
 7 came back.

8 Q And is she an African-American woman?

9 A She's an African-American female.  
 10 And when she came to the district, to the unit, she  
 11 was automatically assigned to my platoon. I never  
 12 knew that Lieutenant -- Sergeant Vann, she's a  
 13 lieutenant now. I never knew that she had a issue  
 14 with me. But she did, because of the Commissioner's  
 15 aide, which was the chief at the time, Kimberly  
 16 Byrd, she thought that Kim Byrd we were these great  
 17 friends, and she had an issue with her.

18 The first day Sergeant Vann came to  
 19 the district, came to the unit, I never knew she was  
 20 there. Lieutenant Feinman took her in the office  
 21 and they had a meeting. Normally you would meet  
 22 with both of your supervisors at the same time.  
 23 They had a meeting by themselves. I find out she's  
 24 there. I'm like, oh, my goodness, I'm getting ready

1 to welcome her. As I'm turning the corner to go  
 2 into the sergeant's office, I hear her say, why did  
 3 they put me in that bitch's squad? I don't want to  
 4 be in that bitch's squad. She was talking to Chief  
 5 Blackburn.

6 Q Okay. Let's back up a minute. Sergeant  
 7 Laverne Vann, she would be your peer or  
 8 counterpart --

9 A My peer.

10 Q Right. So why would she -- help me  
 11 understand why she would be in your squad.

12 A She was placed there as a sergeant.

13 Q Um-hmm.

14 A But I never -- all of the other  
 15 sergeants that came before her, they never gave me  
 16 help. She comes and she has a issue with me and  
 17 they put her in my squad. I don't know that she has  
 18 an issue with me, but they know. Meaning Kelly,  
 19 Feinman, they know she has an issue with me, so they  
 20 put her in my squad for us to bump heads, basically.  
 21 And she was friends with them. So whatever they  
 22 told her to do, she did to me. She made a statement  
 23 that anything that she's ever got on the job, and  
 24 she was telling this to someone else in the office.

1 She said, anything that I ever got on this job I  
2 never got from a black person. Everything I got I  
3 got from a white man.

4 Q But was she reporting to you?

5 A No. She was my peer.

6 Q Right. Okay.

7 A She followed the directions of the  
8 supervisor. She did things to me by not allowing  
9 subordinates to respect me. She told them they  
10 didn't have to listen to me. She was going along  
11 with what was already happening to me there in the  
12 Narcotics Strike Force.

13 Q And who was the supervising lieutenant then?

14 A That was Lieutenant Feinman.

15 Q Okay.

16 A And they rode in the car together  
17 every night. They went to get coffee. They brought  
18 each other coffee in. Not that I wanted coffee.  
19 But they brought each other coffee in, they never  
20 talked to me. So it was a division right there. It  
21 was -- Lieutenant Feinman and -- they showed  
22 disparity consistently.

23 Q Now, I cut you off. But I want to circle  
24 back to Captain Kelly coming to the NSF in 2006 and

1 A They were sergeants. They were my  
2 peers. And it was -- basically the complaints  
3 were -- came from the officers, which was the  
4 surveillance officers, which was Jeannie Spicer, and  
5 also we had two squads, which was the bike squad and  
6 the line squad. And the bike squad, they thought  
7 that they were the elite. When you work together in  
8 a unit, you know, you have to be fair with  
9 everything. And if I did anything that they did not  
10 like, they could get transferred out of my squad.  
11 If I told an officer, you know what, you can't go to  
12 lunch today, they would go inside and tell the  
13 supervisors and they would get transferred.

14 Q With all of this conduct, the comments by  
15 Jeannie Spicer, her brother, her boyfriend --

16 A Yes.

17 Q Did her boyfriend work in the NSF?

18 A Yes.

19 Q Did you go to the EEO unit of the police  
20 department and lodge a complaint?

21 A I would never use the EEOC in EEO in  
22 the police department. They're -- the people that  
23 you make the complaints to are friends with the  
24 people that they could have worked as a partner next

1 then you -- let's talk about the meeting with  
2 Captain Kelly, your meeting with Captain Kelly.  
3 Tell me about that meeting.

4 A He was saying that he was meeting  
5 with all of the supervisors, but he brought me in  
6 and was telling me, you know, what other supervisors  
7 had stated, which was -- one of them was Sergeant  
8 Hayes. Jeannie Spicer had went to him and told him  
9 that, you know, I didn't basically know what I was  
10 doing or whatever. I had more time on the job than  
11 her. But it wasn't that I didn't know what I was  
12 doing. I wasn't allowing her to be corrupt.

13 Q Okay. So tell me about the meeting with  
14 Captain Kelly.

15 A That was basically it. He was  
16 telling me, trying to find out what were some of the  
17 complaints that, you know, that they were -- the  
18 other supervisor, which was Hayes and --

19 Q Is Hayes black or white?

20 A He's a white male.

21 Q Okay.

22 A All of these supervisors were white  
23 males.

24 Q Are they sergeants?

1 to that person. They have cops, police and cops. I  
2 would never go to them, because it wouldn't be -- it  
3 would be bias.

4 Q Okay. Did you tell Commissioner Johnson  
5 what was going on?

6 A No, I didn't. I didn't have -- I  
7 didn't know Commissioner Johnson that well to go  
8 over and just make a phone call and call him on the  
9 phone and say this is what they're doing to me. I  
10 didn't know him in that capacity. Although, this is  
11 the rumor that went around because I went directly  
12 to the Narcotics Strike Force. I did not know  
13 Commissioner Johnson in that capacity. But any time  
14 Commissioner Johnson moved a black female in the  
15 Philadelphia Police Department he had to be sleeping  
16 with them or they were his niece, as the white males  
17 stated about them. You couldn't just get moved on  
18 your merit. You had to be sleeping with the  
19 Commissioner in order to get there. And that was  
20 just an overall gist of his reputation in the police  
21 department.

22 And because of his reputation in the  
23 police department because they thought that I was  
24 affiliated with Kim Byrd, now Commissioner Ramsey



1 doesn't like me, because he doesn't like Kim Byrd.  
2 I'm just being honest. This is what it's all about.

3 Q You're under oath. You have to be honest.

4 A Okay. Yes. This is what it's --  
5 this is what it's all about. He has a problem  
6 because they thought that Kim Byrd transferred  
7 people and she had all of these friends. Any phone  
8 records that I have will show that Kim Byrd and I  
9 were not friends. I saw her, she saw me, hey, how  
10 you doing, whatever the case may be. But we were  
11 not friends. I didn't hang out with her. I didn't  
12 talk to her regularly on the phone.

13 Q What was your relationship like with your  
14 supervisor, Lieutenant Feinman?

15 A Lieutenant Feinman came to -- as soon  
16 as he came in, ma'am, the first statement that he  
17 made was -- he's made a statement about impact and  
18 he knew a whole bunch of people in impact in  
19 Internal Affairs. I didn't know what he was -- what  
20 that was referring to. I didn't know why he would  
21 say that to me. And I said, okay, sir, well, you're  
22 my supervisor, but I don't know why you're referring  
23 to impact. After he got there I knew that there  
24 were some goings-on with the way that he

1 surveillances were being conducted. I had officers  
2 complaining to me about the manner in which Officer  
3 Jeannie Spicer was conducting surveillances and also  
4 the credibility, her credibility was in question.  
5 And it wasn't just the officers, it was myself as  
6 well.

7 Q Okay. Did there come a time when you asked  
8 Captain Kelly to investigate the Eric Dial situation  
9 incident?

10 A Yes.

11 Q And what did Captain Kelly say and or do in  
12 response to your request for an investigation?

13 A I remember I asked Captain Kelly in  
14 the roll call room, I specifically asked him, what's  
15 going to happen with Eric Dial? This was on a day  
16 when I had told an officer that he could not do  
17 something on a surveillance. I can't remember  
18 exactly what it was. But it was Officer Billy Toll.  
19 And when I came into headquarters Billy Toll had  
20 already called headquarters and told Lieutenant Haag  
21 that I had said something to him that I was doing my  
22 job incorrectly and I was telling him to do  
23 something that he didn't want to do. I was upset.  
24 I was crying, because at that point, ma'am, I was so

1 fed up.

2 Captain Kelly came into the roll  
3 call room and I stated to him, this is happening to  
4 me, sir, because you have not done anything. No one  
5 is helping me and no one is doing anything. Ever  
6 since Eric Dial called me those names and nothing  
7 was done under Broadbent's command and now you're  
8 here. This is why they are continually -- my  
9 subordinates are being insubordinate. He told me  
10 that he could not punish an officer for something  
11 that didn't happen under his command, which is  
12 totally false, according to police policy.

13 Q And did there come a time when you wrote a  
14 memo to Captain Kelly about this?

15 A I wrote several memos to Captain  
16 Kelly about incidents that were occurring. However,  
17 I did write a memo from -- through the chain of  
18 command from Lieutenant Feinman all the way through  
19 to Chief Blackburn, detailing the things that  
20 happened, some of the things that had happened while  
21 I was assigned and that I had sent paperwork through  
22 and referencing requests for formal disciplinary  
23 action and nothing was done.

24 Q In these memos did you ever reference being

1 called Shanaynay, Sheneneh, the Eric Dial incident,  
2 being called black bitch, did you write that in the  
3 memo?

4 A Yes, ma'am. And they still didn't do  
5 anything. Until this day they have never talked  
6 about it. I saw -- Chief Broadbent had came over to  
7 the Narcotics Strike Force one day. I said, chief,  
8 did you get my memo, are you going to help me out?  
9 He says, I gotta go, Sandra. I can't talk about  
10 that. And he walked away from me. Until this day  
11 it has never been settled.

12 Q So after Captain Kelly tells you that  
13 there's really nothing that can be done 'cause it  
14 didn't happen on his watch, what, if anything, did  
15 he do? Did he do nothing?

16 A He did nothing. About -- I don't  
17 know how long after I spoke to him, I ran into then  
18 Chief Kimberly Byrd, Kim Byrd. And when I ran into  
19 her, she asked me the same thing, hey, how are you  
20 doing, how you making out there? I wasn't gonna  
21 lie. I said, I'm not making out great over there.  
22 And she says, what's going on? I said, I got a guy  
23 over here that called me all of these names and he  
24 was never punished. She was appalled. She said,



1 well, how did this person not get punished and you  
 2 wrote formal disciplinary action? I told her, I  
 3 don't know. She contacted -- I'm getting ready to  
 4 say inspector. He's now an inspector -- Captain  
 5 Kelly. And she informed him, she asked him about  
 6 the disciplinary action. I learned this later, that  
 7 she asked him about the disciplinary action. He  
 8 stated that he has started investigations and that  
 9 none of the people that he investigated stated that  
 10 anything happened. She said, well, I want to have  
 11 the whole squad investigated. How can you just  
 12 interview a certain amount of people? You have to  
 13 interview the whole squad to find out if something  
 14 happened. Later Captain Kelly only interviewed  
 15 Keith Sadowski and William Campbell.

16 Q Those were the only people he interviewed?

17 A He interviewed after she told him to  
 18 interview the entire squad.

19 Q But he only interviewed William Campbell and  
 20 Keith Sadowski?

21 A After Chief Byrd spoke to him.

22 Q So he only interviewed two people?

23 A Yes. He did not interview the entire  
 24 squad like she informed him to do.

1 Q Were you friends with William Campbell and  
 2 Keith Sadowski?

3 A I was never friends with them. I  
 4 worked with William. We call him Billy. I worked  
 5 with William Campbell in the 25th District. I was  
 6 in 2 Platoon. He was on last out, night work. We  
 7 saw each other in passing, was at a promotional  
 8 examination together, hey, how you doing. Keith, I  
 9 knew Keith from the 39th District. I had only had  
 10 one interaction with him when he was in the 39th  
 11 District. We were talking about arrests that had  
 12 been made. I didn't know either one of them. And I  
 13 had a good relationship with them, working  
 14 relationship. But not a relationship where we went  
 15 out to eat lunch together consistently. It was none  
 16 of that.

17 Q Do you know what they testified to or what  
 18 they stated -- not really testified, but what they  
 19 stated to Captain Kelly in connection with the Eric  
 20 Dial incident? Are you aware of the contents of  
 21 their statements?

22 A Now I am, yes. Afterwards. I mean,  
 23 when they had their statements, you're not supposed  
 24 to talk about anything.

1 Q So you didn't know it at that time.

2 A No, I didn't know at that time. Only  
 3 thing I know is they, about maybe a couple weeks  
 4 later, or something, they brought it to my knowledge  
 5 that they were being treated unfairly. Like people  
 6 stopped talking to 'em. I knew it was a difference  
 7 even with myself, but they stopped talking to Keith.  
 8 They stopped talking to Billy. Keith was in the  
 9 men's locker room and someone said something like,  
 10 you're supposed to be on our side, referencing  
 11 whites. And then it was a note placed on, I believe  
 12 it was Keith's locker. It was either Keith or  
 13 Billy's locker, I can't remember. But someone had  
 14 wrote a note stating that they were going to contact  
 15 somebody. I really don't know the gist of the note.  
 16 However, someone went by and wrote "rat" on the  
 17 note. I was aware of that.

18 Q Now, were William Campbell and Keith  
 19 Sadowski your direct reports?

20 A Yes, they reported directly to me.

21 Q And did you have a good working relationship  
 22 with them?

23 A Yes.

24 Q Okay.

1 A But they were all treated fairly.

2 Everyone. I treated everyone fairly.

3 Q Do you need a sip of water?

4 A Yeah, you could tell. Thank you.

5 Q Did you go to the EEOC in connection with  
 6 these incidents with regard to racial remarks,  
 7 hostile work environment issues, sex discrimination?  
 8 Did you go to the EEOC at any time?

9 A Yes. I went to the Federal EEOC in  
 10 2006. They lost my paperwork and I had to refile in  
 11 2007. When I filed in 2006, that's the paperwork  
 12 that contained a lot of other information that I  
 13 could not use. That was the information that had  
 14 incidents about McCullum, some of the things that  
 15 had happened prior to me getting to the Narcotics  
 16 Strike Force and how my reputation and my character  
 17 was assassinated before I arrived there.

18 Q Were any of your work assignments ever  
 19 changed while you were at the Narcotics Strike  
 20 Force?

21 A Well, yeah. Like I said earlier, I  
 22 was given unfair details. A lot of Saturdays they  
 23 would have details, and no one really wants to go to  
 24 a detail. You want to work, you know, with your

1 officers. But after I got there every detail  
2 Lieutenant Spangler was sending me to the details.

3 Q What does that mean sending somebody to the  
4 details?

5 A Well, like you get details of  
6 funerals or if they're having a rally they would  
7 send a narcotic supervisor to those types of  
8 details. And that's what he -- not that I didn't  
9 want to go, because it was for the community. But  
10 why did I have to be the only person that went when  
11 Sergeant -- our squad was full. Sergeant Lackman  
12 and Sergeant Presbyorker were in the squad.

13 And that's another issue I would  
14 like to go back for a minute to when I arrived  
15 there. I was placed in Lieutenant Spangler's  
16 platoon, which was 2D, and there were other platoons  
17 that was lacking supervisors. So I could have went  
18 somewhere else to help out, but I was specifically  
19 placed in Lieutenant Spangler's squad so that he  
20 would be able to come after me and make a hostile  
21 working environment for me.

22 Q But these details are part of the job,  
23 correct?

24 A They're part of the job, yes. But it

1 doesn't mean that it has to be part of my job.

2 Q They're not viewed as a demotion, correct?

3 A They're viewed -- as far as the norm  
4 in the police department, they're viewed as getting  
5 stuck with something. It's an unfavorable  
6 assignment.

7 Q But it's part of the job, correct?

8 A It's part of the job, yes.

9 Q Did your salary remain the same?

10 A Yes.

11 Q Okay. At some point did you request a  
12 transfer from NSF to Citywide Vice?

13 A I requested the transfer per Captain  
14 Sharon Seaborough and staff inspector -- at the time  
15 Staff Inspector Teresa Peay-Clark.

16 Q Tell me how that came about.

17 A Apparently someone had went to these  
18 females and explained to them what I was going  
19 through at Narcotics Strike Force. I didn't go to  
20 them. Captain Seaborough contacted me and told me,  
21 look, I talked to Terry Peay-Clark and we know that  
22 they're trying to stop you from getting promoted.  
23 So Terry -- Inspector Peay wanted me to come over to  
24 Citywide Vice, because she worked in that building

1 and she wanted me to work on daywork with her so  
2 that I would -- so that she could kind of monitor  
3 what was going on, because she had heard of the  
4 things that was going on with me and that people  
5 were bothering me and I was working in a hostile  
6 working environment. I couldn't go to daywork,  
7 because there was another officer there, a corporal  
8 there, Janine Merritt, who couldn't work 6:00 to  
9 2:00. So she said, well, work 6:00 to 2:00, which  
10 was 6:00 p.m. to 2:00 a.m., but I'll still be in the  
11 building with you.

12 Q And what period of time did you -- so you  
13 successfully got the transfer to Citywide Vice,  
14 correct?

15 A Yes. But it was already -- it was  
16 a -- I didn't have to fill out any paperwork to go  
17 there. They just told me to report there. I  
18 reported.

19 Captain Kelly contacted me and told  
20 me that I had to write a memorandum to go to  
21 Citywide Vice. I said, well, I wasn't told that,  
22 sir. I wrote the memorandum and in the memorandum  
23 it stated that I am leaving the Narcotics Strike  
24 Force because I'm working in a hostile working

1 environment. It was a summary of what I was  
2 stating. That was the only reason I was going to  
3 Citywide Vice. I didn't want to go there. He told  
4 me that I had to change the memorandum and to put on  
5 the memorandum that I requested to go there and that  
6 was basically it, because he wouldn't accept the  
7 other memorandum. So he forced me to change the  
8 reason why I was going there.

9 Q Did you change the memorandum?

10 A Yes, I did.

11 Q Okay. Did you want to stay in narcotics?

12 A I didn't. I didn't want to -- I  
13 didn't want to stay in narcotics. Well, Vice is a  
14 part of narcotics. I wanted to get out completely,  
15 but I was on a promotional list. So there was no  
16 need for me to put in a transfer to go somewhere  
17 else, because I was on a promotional list to leave.

18 Q So give me the time period that you were  
19 transferred to Citywide Vice.

20 A I went to Citywide Vice I believe in  
21 February of 2007.

22 Q And what rank were you at this time?

23 A I was still a sergeant.

24 Q Okay. And what were your duties?

1 A I didn't really have a lot of duties  
2 in Citywide Vice. I was just there to monitor the  
3 officers while they went out and got arrests for  
4 people who were soliciting with prostitution.

5 Q Did anybody engage in any racially  
6 discriminatory conduct towards you at Citywide Vice?

7 A Well, I had one officer, Karina Bail,  
8 she was -- it might be Bailey is her last name. She  
9 had said quite a few things in reference to what was  
10 going on in Narcotics Strike Force. And she was  
11 consistently stating that Chief Blackburn was going  
12 to get me. All of the white shirts were going to  
13 get me. This is a statement that she made to  
14 another officer, which was Officer Weston.

15 In addition, one day I was going up  
16 on the elevator at CJC and the doors open and she  
17 didn't see me standing there and she was making the  
18 same statements to someone else.

19 Q But if I hear your testimony correctly, she  
20 wasn't making the statement directly to you?

21 A No. But they were about me and she  
22 was spreading those rumors of -- about me to other  
23 people.

24 Q Did anybody else engage in any

1 didn't want me to know that he was coming in. He  
2 also stated that in roll call.

3 Q Tell me about that. Who stated what in roll  
4 call?

5 A Corporal Connor (sic) went to roll  
6 call and stated that the lieutenant was coming in  
7 and the reason why he was coming in is to monitor  
8 me.

9 Q Did he say this in roll call in front of the  
10 squad?

11 A Yes. Yes. And they have wrote  
12 statement -- or, well, stated this in other  
13 investigations.

14 Q Did you go to anyone to complain about this  
15 conduct?

16 A I just added it onto my EEOC  
17 complaint.

18 Q You didn't go back to Inspector Peay or  
19 Captain Seaborough?

20 A Oh, I told them, you know, that,  
21 look, this is what's going on. They said, well, you  
22 know, just hold your time until you can get out of  
23 here.

24 In addition, Lieutenant Green

1 discriminatory conduct or make comments about you  
2 that could be construed as sex discrimination?

3 A Well, I believe that Lieutenant  
4 Green, he came -- as far as my gender is concerned,  
5 he came to work to monitor, to monitor me. For --  
6 he had never did that. The sergeants were surprised  
7 that he came to work. He came to work on -- after  
8 hours. After he was off the clock he came back to  
9 work to monitor me.

10 Q What shift were you working?

11 A I working 6:00 p.m. to 2:00 a.m. And  
12 like I said, it wasn't much that I had to do. I  
13 just basically went out, listened to the radio,  
14 monitored the officers. And I sat behind the patrol  
15 wagon when the people who were arrested were placed  
16 inside of the patrol wagon. And sometimes I would  
17 go around and monitor to make sure that the -- for  
18 quality purposes go around and monitor to make sure  
19 they were doing their job.

20 Q Miss Russell, how do you know that he was  
21 coming back to work to monitor you?

22 A Because Corporal O'Connor got the  
23 phone call, and he came in and he not only stated to  
24 me that the lieutenant -- he told me the lieutenant

1 contacted me on the phone and accused me -- I have  
2 the date that he did it, but I'm not for sure what  
3 day it is. He contacted me and accused me of -- it  
4 was another sergeant there. So I'm getting confused  
5 with the names, because there's so many names.  
6 Danny -- his first name is Dan. He was a sergeant  
7 that worked with me. He contacted me to state that  
8 I had placed Dan on the DAR, which had him placed  
9 for working and he wasn't. He totally accused me of  
10 this. And the problem was, I didn't have -- when  
11 you're -- I was detailed to Citywide Vice. I could  
12 only go into their records to change -- to put the  
13 payroll -- I mean, to put the time in. If I was  
14 transferred there I couldn't go in, but he  
15 automatically accused me of it. And they had gave  
16 permission to an officer to put it in.

17 Q Well, what was the frequency of any racial  
18 comments or sex discrimination comments while you  
19 were at Citywide Vice?

20 A I can't -- I don't recall at this  
21 time, ma'am. It's been so -- I'm just being honest.  
22 It has been so many years. I mean, if I was to look  
23 at my paperwork, then I would be able to recall and  
24 I would be able to give you exactly what happened

1 with that particular incident. However, at this  
2 time, I don't -- I really don't -- those were the  
3 only things that I recall at the time, was me not  
4 being able to punish with Chief Blackburn, me not  
5 being able to punish Karina Bailey, Corporal  
6 O'Connor stating that the lieutenant was coming back  
7 to work to follow up on me. And I was the only  
8 female supervisor there again sergeant. He did not  
9 do that for the other male sergeants that were  
10 there.

11 Q Okay. Did there come a time when you were  
12 promoted to lieutenant?

13 A Yes.

14 Q And when was that?

15 A That was in November of 2007.

16 Q And what was your next assignment when you  
17 were promoted to lieutenant?

18 A 19th District.

19 Q And you were assigned there?

20 A Yes.

21 Q By whom?

22 A I don't know. But I know Captain  
23 Singleton asked me to come to the 19th District.  
24 First he asked me did I know how to do CAPS. And

1 BY MS. SHIELDS:

2 Q And I'm going to let you read it.

3 A I know what I put on there.

4 Q Okay.

5 MS. SHIELDS: We're going to mark this  
6 as D-1.

7 \* \* \*

8 (Whereupon, the above-mentioned  
9 card was marked for identification  
10 as D-1.)

11 \* \* \*

12 BY MS. SHIELDS:

13 Q Is this a card that you gave to -- just to  
14 identify D-1 for the record. It's a thank you card.  
15 Would you describe it and read the contents.

16 A Yes. This is when I first got to the  
17 district the first week I was there. Captain  
18 Singleton, thank you for welcoming me into your  
19 district. I am happy to work for someone with so  
20 much knowledge and leadership skills. Add on -- I  
21 can't even remember my own handwriting. Add on -- I  
22 think it says add on a personality that is bar none  
23 and you have the best. It feels good to know that  
24 someone has your back even when you don't ask.

1 those were complaints against police. Because  
2 everybody doesn't know how to do them. I told him I  
3 did. This was on a day of my promotion, he walked  
4 up to me with several other people standing around  
5 me and asked me, he says, I need an adamant  
6 lieutenant, you want to come work for me? And I  
7 told him, I don't like working inside. So I don't  
8 think I want to come to the 19th District. Next  
9 thing I know, I was transferred to the 19th  
10 District. But I did not want to go there. And  
11 commanders do have a say in people that come to  
12 their districts. They can contact the transfer,  
13 whoever's doing the transfers, and say, I want this  
14 person and that person.

15 Q Did you ever go to anybody and say, I really  
16 don't want this assignment?

17 A I can't -- on the day of promotion I  
18 can't tell -- you get assigned that day.

19 Q I'm going to give you copies of this. I'm  
20 going to let you --

21 A That's the card I wrote.

22 MS. SHIELDS: I'm going to let you  
23 read the card.

24 MR McDUFFY: Yes.

1 Bless you always, Lieutenant Sandra Russell.

2 Q And is that your handwriting?

3 A Yes, it is.

4 Q And this is a card that you sent?

5 A On the first day of the first week  
6 that I was in the district.

7 Q Okay. Did Captain Singleton engage in any  
8 conduct towards you that would be sexually  
9 harassing?

10 A Absolutely.

11 Q And would you describe that conduct. What  
12 did he do?

13 A Captain Singleton stated --

14 Q When?

15 A Today. That I had met him prior, but  
16 he couldn't remember. But he does remember meeting  
17 me in 1998 at Lieutenant Josey's house.

18 Q Continue.

19 A He asked me to give me -- get my  
20 phone number on that day. I think it was April of  
21 1998. And he was trying to have a conversation with  
22 me in reference to going out. I declined. I didn't  
23 see Captain Singleton again. I think he was  
24 promoted to sergeant that day. I didn't see Captain

1 Singleton again until I was assigned to the 23rd  
2 District and he was in narcotics. I saw him in  
3 passing when I would go downstairs and change my  
4 clothes at the locker and we would briefly, you  
5 know, have a conversation or whatever. And he just,  
6 you know, just a normal conversation. He was  
7 telling me he had got married and different things.

8 I left the 23rd District, of course.

9 I went to Narcotics Strike Force. I didn't see  
10 Captain Singleton again till the promotion in 2007.  
11 That's why I was surprised when he walked up to me  
12 and asked me if I wanted to come and work for him,  
13 and he was working in narcotics when all of these  
14 things were going on. He was in narcotics and I was  
15 in narcotics at the same time. But even though we  
16 were in separate units the bureaus are all the same.  
17 He was in the field unit and I was in the Narcotics  
18 Strike Force. He was promoted I believe in June of  
19 2007 or July. And I was promoted in November of  
20 2007. So there's no way in the world that Captain  
21 Singleton did not know what was going on in  
22 narcotics, because we're all in the same bureau.

23 Q When you became his administrative  
24 lieutenant did he ever ask you out on a date?

1 A He never asked me out on a date. But  
2 he asked me was I married. He had conversations  
3 with me -- like his mother is a Libra. I don't know  
4 his mother. He told me -- he asked me, what's your  
5 sign? I told him, well, I'm a Libra. He said, oh,  
6 yeah, you're just like my mom. You know, my mom,  
7 she can't stand no good men or a man -- something  
8 about no good men or whatever the case may be, and  
9 she's a perfectionist like you. That's what this  
10 male said to me. I don't know his mother to tell me  
11 that his mother was a Libra. He was having these  
12 conversations with me. This is not the first time.

13 He was asking me about being fixed.  
14 I don't know what being fixed is. He said this to  
15 me on three occasions, ma'am. It was like months  
16 apart. He said it to me in like 2007, then he said  
17 it again in like the beginning, I think, of -- I  
18 don't know the dates, but I know it was like months  
19 apart he asked me. And finally I said to him -- I  
20 asked my son, I said what is fixed or whatever.  
21 He's like, I don't know. He thought he was talking  
22 about being -- vasectomy. I said to him, I said,  
23 what are you talking about vasectomy, uncircumcised?  
24 He said yes. That's what he said to me. And he --

1 and I had a ring on one day. It's a Tiffany ring  
2 that my grandmother gave me years ago. I had it,  
3 but it was turned on backwards. It's a gold ring.  
4 I came in there and he said to me, so what, you went  
5 and you got married on me? This is what Captain  
6 Singleton said.

7 Q Okay. Did he ever ask you to have sex with  
8 him?

9 A No.

10 Q Okay.

11 A No, he did not.

12 Q Did you tell him to stop the comments?

13 A I told him that. I said, I don't  
14 want to have this conversation anymore. I told him  
15 that after he talked about the circumcised. I was  
16 afraid to close his door when I went into his  
17 office. Oh, come on in, sit down, Lieutenant. I  
18 felt uncomfortable after he had the first  
19 conversation.

20 But, ma'am, I had came from a place  
21 that had already characterized me and said things  
22 about me from Narcotics Strike Force. All I want to  
23 do at this time is do my job and come from under the  
24 radar. I don't want any more problems, ma'am. I

1 don't. I didn't want any more problems. I was --  
2 just went out and did my job and I got tired of my  
3 name being stuck up under the mud. And it wasn't me  
4 as a Christian. I'm sorry. It just bothered me.  
5 And I stayed away from it. All I wanted to do was  
6 come to work every day and I did my job and I did it  
7 to the fullest. I set that entire district up for  
8 Captain Singleton. He didn't know what he was doing  
9 when he got there. But because I had worked in 5  
10 Platoon in the 23rd District I was able to do that  
11 for him. I set up those details for him and helped  
12 in his crime patterns.

13 Q Okay.

14 A He did say sexual things to me.

15 Q Are they the same things that you've  
16 testified about?

17 A Yes. I'm not gonna lie and say he  
18 asked me to have sex with him, because he didn't.

19 Q Okay.

20 A He didn't ask me to go out on a date.  
21 But he made sexual comments.

22 Q Every day?

23 A No. No, he didn't make sexual  
24 comments every day. He didn't. And I don't believe

1 Captain Singleton is that type of person to make  
2 sexual comments every day. But I know that he made  
3 those comments.

4 Q Did he treat you as a professional?

5 A No. He did when I first came there.

6 But, like I said, he was -- go ahead.

7 Q Did there was come a time when your  
8 professional relationship deteriorated?

9 A Yes, ma'am.

10 Q Okay. And did there come a time when he  
11 reassigned you to another platoon rather than be his  
12 administrative aide?

13 A Yes. And I thanked him for that.  
14 Because I wasn't an inside person. I never wanted  
15 to work in the inside. If you look at my files, I  
16 didn't want to work in the inside. But he gave me  
17 the assignment and I was glad to be there.

18 Q Okay.

19 MS. SHIELDS: I'm going to show you  
20 this card.

21 MR McDUFFY: Thank you.

22 MS. SHIELDS: I'm going to make copies  
23 of this.

24 MR McDUFFY: Okay.

1 MS. SHIELDS: I have to Bates stamp it  
2 and everything.

3 THE WITNESS: Um-hmm. I remember  
4 writing that. I like writing cards.

5 BY MS. SHIELDS:

6 Q I'm going to identify this as D-2. It's a  
7 card with tulips on it.

8 A Um-hmm.

9 Q And I'm going to show you this card and ask  
10 you to read it.

11 A Okay. Captain Singleton, thank you  
12 for the opportunity to work for you. I enjoy the --

13 Q Slowly, 'cause she's got to take it down.

14 A Oh.

15 Q Go ahead.

16 A You want me to start over?

17 Q Yes.

18 A Captain Singleton, thank you for the  
19 opportunity to work for you. I enjoyed the work and  
20 efforts put forth. I will continue to be a work  
21 house in 1 Platoon. Thank you, Lieutenant Russell,  
22 128.

23 \* \* \*

24 (Whereupon, the above-mentioned

1 card was marked for identification  
2 as D-2.)

3 \* \* \*

4 BY MS. SHIELDS:

5 Q In connection with Captain Singleton's  
6 comments or conduct towards you, did you -- once  
7 again I'm going to ask you, did you file an EEO  
8 complaint?

9 A Later I did.

10 MR McDUFFY: You got to wait for the  
11 question to be finished.

12 THE WITNESS: Oh, I thought she was  
13 finished.

14 BY MS. SHIELDS:

15 Q No, I'm talking slowly.

16 A Oh, okay. Yeah, I talk fast.

17 Q You're too quick for me.

18 Did you file a Police Department EEO  
19 complaint?

20 A No.

21 Q Why not?

22 A Because I don't trust the  
23 Philadelphia Police Department.

24 Q Did you file an EEOC charge with regard to

1 Captain Singleton's conduct and comments?

2 A Yes.

3 Q Did you tell him that you were filing those  
4 charges?

5 A No.

6 Q Just give me a moment.

7 A Yes, ma'am.

8 \* \* \*

9 (Pause.)

10 \* \* \*

11 BY MS. SHIELDS:

12 Q There are a couple complaints against police  
13 that were filed against you, Miss Russell.

14 A Yes.

15 Q One was from a Mr. Osai, O-S-A-I, Becton,  
16 B-E-C-T-O-N, a proprietor of a barbershop. And can  
17 you tell me about that incident.

18 A In detail or basic summary?

19 Q Just a basic summary of him complaining  
20 about your conduct towards him --

21 A (Witness nods head.)

22 Q -- and the comments of calling him the N  
23 word.

24 A Okay. I do a lot of community

1 policing. I go around the neighborhood and I talk  
2 to people in the neighborhood. People are always  
3 complaining about they don't have jobs. I go to a  
4 lot of places, McDonald's, wherever who has a help  
5 wanted sign, I get the person's information. And I  
6 am a person that gets out of my patrol car and I do  
7 talk to the young fellows on the corner, because I  
8 do have to make a difference in the community. And  
9 they said, oh, well, you know, I need a job. I got  
10 one for you, go over to this place or go over to  
11 that place. I always did that. I did that as an  
12 officer in the 25th District. And people that  
13 worked with me know that I did that. I saw a help  
14 wanted sign in the window. I rode past.

15 Q Of where?

16 A Of the barbershop. I saw a help  
17 wanted sign in the window. It was facing 52nd  
18 Street. I went around the corner and when I came  
19 back I parked -- I can't remember whether I  
20 parked -- I parked on the parallel street. I can't  
21 remember which street that is right now. Maybe  
22 that's Thompson Street. It was two gentlemen  
23 standing outside the barbershop. That's why I  
24 stopped. I said, hey. Basically help wanted,

1 what's the phone number or whatever. 'Cause all it  
2 said was help wanted. They said, well, you see the  
3 help wanted sign. I said, yeah, but I don't know  
4 where it is. I don't know -- there was nothing --  
5 there was no name on the barbershop. I said, I  
6 can't give anybody directions or tell them where to  
7 come, you don't have any name here. That was as far  
8 as it got about a sign in front of the barbershop.  
9 I never called this gentleman a nigger.

10 In 1997, and you could look up the  
11 records, my brother was stabbed by Donald Murdoch,  
12 because they walk -- a bunch of white males walked  
13 up and said it was nigger night because it was only  
14 seven black families living in Olney. My father sat  
15 down with us that night, because we were never  
16 allowed to use that word. Because people were  
17 beaten for us to not be called those names. And  
18 told us that we better not ever use that word.

19 But this same officer that tried to  
20 stab my mother and stabbed my brother and my brother  
21 almost died, he's on the Philadelphia Police  
22 Department.

23 Q Okay.

24 A So I don't use the word nigger. And

1 another thing, how can I be found guilty of a  
2 complaint of what somebody else said that I said?  
3 His workers said that I called him that. That  
4 doesn't make sense, ma'am.

5 Q Did there come a time when you sustained a  
6 work related injury when you were detailed to the  
7 16th District?

8 A I worked -- oh, yeah. I was -- well,  
9 yeah, I was covering. I wasn't detailed there,  
10 actually.

11 Q You were covering.

12 A I was covering the 16th District,  
13 yes, I did, ma'am.

14 Q And did you sustain an injury to your head  
15 at that time?

16 A Yes. I sustained an injury as I was  
17 looking on the ground for shell casings. There was  
18 a two-by-four, not a stick, a two-by-four was well  
19 five feet out of the vehicle. It was a low vehicle.  
20 And they kept -- my officers kept calling me and  
21 stating, you have to call homicide, because homicide  
22 refused to come out to the scene. And they were  
23 only sending the detectives. But the gentlemen  
24 was -- passed, had passed. I struck my head from

1 above my eye all the way across my ear, because I  
2 was facing this way and it hit me. And it's on a  
3 slant. At that time I had wood shavings all over  
4 the front of my shirt (indicating).

5 Q Were you bleeding?

6 A I wasn't -- well, it was a little.  
7 But, you know, like a -- more like the -- if you get  
8 scraped on a piece of wood it's like the white comes  
9 off. You see your -- that's what it was. And I  
10 went to Sergeant King, and it was other officers out  
11 there, and I said, you know, I just hit my head on  
12 that stick. And I'll be honest, I was so vain I was  
13 looking up at the helicopters hoping that they  
14 didn't catch me hit my head on the stick and appear  
15 on Dumbest Cops.

16 They wiped the -- helped me wipe the  
17 wood -- that's how hard I hit my head, that they  
18 helped me wipe the wood off of my shirt.

19 Sergeant King immediately contacted  
20 radio, police radio. That is the protocol. The  
21 protocol is you contact police radio and you give  
22 the badge number of the officer that is injured,  
23 then you contact the front desk. You contact the  
24 front desk, you give that officer's information, the



1 badge number, and where the injury was sustained.  
2 In addition, you let the front desk know whether  
3 that officer is being transported to the hospital or  
4 whether that officer is not going to go to the  
5 hospital at the time.

6 The next thing that you do is you  
7 generate a 75-48A. A supervisor generates that  
8 injury report, not you. A supervisor on the scene  
9 generates that injury report. Sergeant King  
10 generated that injury report. That supervisor is  
11 supposed to notify -- make sure that the operations  
12 room supervisor is notified of the injury so it can  
13 be reported on the sending and receiving sheet for  
14 the day.

15 Q Go ahead. I'm sorry.

16 A The injury report, the injury report  
17 is supposed to be filled out by your supervisor.

18 Q Did you go to the hospital in connection  
19 with this head --

20 A No. No, I didn't go to the hospital,  
21 because I was trying to be brave at the time. But  
22 then I also didn't want any -- I know it sounds  
23 crazy, but I just didn't want -- I didn't want to  
24 get involved with anything. I didn't want anybody

1 to hear my name. I had been through so many things  
2 in the Strike Force. I didn't want anybody to know  
3 my name. I wanted to just fall off the face of the  
4 police department, because I had been through so  
5 much in the Narcotics Strike Force. And that's the  
6 honest to goodness truth. I just didn't want  
7 anybody asking me anything, ma'am. I just didn't  
8 want anything.

9 Q But there came a time when you did complete  
10 a comp services incident report.

11 A I went to Captain Singleton -- that  
12 day that I was injured Captain Singleton contacted  
13 me via police radio and told me to take  
14 headquarters. He told me to call him, too. I  
15 couldn't use my phone, I used the officer's phone.  
16 And I called Captain Singleton. He told me that he  
17 needed me to come into headquarters to discuss some  
18 things he had just come from comps -- from the comp  
19 stat meeting. I told him, okay, I was out on the  
20 scene. I left there, I went into the district.  
21 Captain Singleton wasn't in the district when I  
22 first came in. He hadn't arrived yet.

23 Q Was this in the morning or in the afternoon?

24 A It was in the morning. I can't

1 remember what time it was when I got back to the  
2 office with him, to the headquarters. But it was in  
3 the morning when I was injured.

4 Q It was in the morning. Do you remember what  
5 time in the morning?

6 I'm just trying to get -- you know,  
7 it's so hard to get the context of this.

8 A I know. It might -- it was between  
9 8:00 and 10 o'clock, something like that.

10 Q Okay.

11 A Okay? Around that time.

12 And he's at comp stat on that -- but  
13 he was at comp stat meeting on that particular day.  
14 Okay? He called me into headquarters. He wasn't  
15 there when I got there. I went into the operations  
16 room. While being in the operations Room Officer  
17 Sharee Mapp, they saw the injury on my head, the  
18 officers in there. I cannot remember everybody that  
19 was there. Officer Sharee Mapp asked me what  
20 happened. I told her I had hit my head, because she  
21 could see the bruise. She went over to the fire  
22 department, which is right around the corner or next  
23 door to us and she got ice packs for my head and  
24 also Tylenol for a headache. 'Cause I had an

1 extreme headache. I went to -- I saw Captain  
2 Singleton coming into the district. When I went to  
3 Captain Singleton's office, he wasn't in his office.  
4 He was further down in the administrative  
5 lieutenant's office. He was standing in the office  
6 at Sergeant Kemchuck's desk and -- at Lieutenant  
7 Kemchuck's desk and Sergeant Feti was sitting at his  
8 desk. Sergeant Feti saw I was holding the ice pack  
9 on my head. They all -- Captain Singleton was  
10 standing there, I had the ice pack on my head. He  
11 comes out, we go into his office. He told me to sit  
12 down. He said, Lieutenant, are you okay? Do you  
13 want to go to the hospital for that? I told him,  
14 no, I don't. I said, I'll be okay. Because I  
15 didn't think it was so severe at the time. I did  
16 not know that I had a concussion. Okay? I'm not a  
17 doctor. I didn't know.

18 Captain Singleton and I discussed  
19 the importance of certain corners having beefed up  
20 patrol. I left his office. I went into the  
21 lieutenant's office, which is the back office in the  
22 operations room, and I stayed there past my time to  
23 report off. Because I was finishing up some  
24 paperwork. I went home and I stayed -- I continued



1 to work, and I'm not -- I had headaches, but I  
2 figured I would get over them. And I started  
3 noticing that I was becoming dizzy. But it wasn't  
4 like severe. Just here and there. Like I would  
5 drive down the street, especially at night when the  
6 lights were going, and then I got out the car and I  
7 feel dizzy.

8 One day I'm standing in the district  
9 and the Officer Johnson, I can't think of her first  
10 name, she said, Lieutenant, why are you talking so  
11 loud? You don't normally talk that loud. She said,  
12 you're normally soft-spoken. I could hear myself  
13 talking in my ear where I was hit.

14 Right after that I had -- I was  
15 driving down the street, it was a complaint for  
16 police at a house on -- I can't think of the -- it  
17 might have been 53rd Street. While I was standing  
18 on the woman's porch and she was telling me, it was  
19 like I was on a merry-go-round. I didn't know it  
20 was vertigo at the time. And I went down. I was  
21 going backwards, and she caught me. She gave me  
22 water, and I sat there and I got myself together.

23 I went into the office and I asked  
24 Lieutenant -- Captain Singleton could I go to the

1 hospital, could I just go get seen for the injury.

2 Q And what was his response?

3 A He told me no problem. That's what  
4 he said, no problem. And he told me, wait a minute,  
5 I have to call. He called down to the, I guess the  
6 safety office. He told me that he needed me to fill  
7 out the injury report. I said, Captain, I thought  
8 you already filled out an injury report. He told  
9 me, no, you have to fill it out. That's not my  
10 responsibility.

11 Q However, at the time that you wanted to seek  
12 medical treatment and go to the safety office, it's  
13 correct that he facilitated it?

14 A Yes.

15 Q Okay. And did you seek treatment or fill  
16 out the comp services report?

17 A I did. I went down to the safety  
18 office.

19 Q Give me a timeframe. I just want to keep  
20 our time sequence correct.

21 A As far as when I went to the safety  
22 office?

23 Q And filled out the comp services report.

24 A He gave me the memorandum. And it

1 was something that I couldn't get there until --  
2 they couldn't see me until a certain date. I can't  
3 remember. Maybe September 17th. I can't remember  
4 what it was. But that's the date I was told to come  
5 down at a specific time to see Carroll Madden and I  
6 think her name is Molly. And when I got there  
7 Carroll Madden gave me information about how the  
8 process worked, because I had never been out IOD. I  
9 had never called out sick or anything. So she gave  
10 me the information and I went to the doctor.

11 Q Did you take any sick time between the time  
12 that you bumped your head in June 2008 and going to  
13 the safety office to see Carroll Madden in September  
14 of 2008?

15 A No, I didn't. No, I don't use sick  
16 time, ma'am.

17 Q Okay. So did you see any physicians that  
18 are recommended by the safety office?

19 A Yes.

20 Q And can you tell me, who did you see?

21 A I saw a doctor at workman -- at  
22 Worknet, Dr. Zabeta (sic) or -- I don't know how to  
23 pronounce his name. But I saw him. And the first  
24 thing he asked me was why did you wait so long to

1 come to the doctor. And I thought that was a very  
2 odd question of why did you wait so long to go to  
3 the doctor. Because I know plenty of officers in  
4 the police department that have injuries and they go  
5 later.

6 Q And what did you say to him?

7 A I told him I just started having  
8 symptoms of me falling out. And at this point I --  
9 and I'm having like severe migraines, but the  
10 falling out is what I was concerned about with a gun  
11 on my hip. And I said I knew it was time for me to  
12 come in and be seen, because this did not happen  
13 until I was injured on the job.

14 Q And what were the -- tell me your symptoms  
15 related to your hitting your head. What did you  
16 tell Dr. Zabaleta (sic) or whatever his name is?

17 A Yeah. Basically that I had the  
18 vertigo, which I didn't describe as vertigo because  
19 I didn't know the name of it. But severe dizziness.  
20 I told him that I did have sensitivity when I look  
21 straight -- like if the lights are right above me,  
22 not looking down, but if I'm looking and it's lights  
23 there. Also I told him about the -- like my vision  
24 in this eye was blurred (indicating).

1 Q Um-hmm.  
 2 A Where I was hit in the eye.  
 3 Q Do you wear glasses?  
 4 A No. I didn't at the time, no.  
 5 Q Okay. Continue. I'm sorry.  
 6 A Okay.  
 7 Q I cut you off.  
 8 A No, that's fine. I didn't wear  
 9 glasses. Where was I?  
 10 Q Symptoms.  
 11 A Oh, yeah. And I guess I said the  
 12 migraine headaches. And then it was like I had  
 13 like -- I couldn't remember anything. And I have a  
 14 very, very good memory. But at that time it was  
 15 just -- it was just confusion, it was a lot of  
 16 little symptoms that was going on, but I still  
 17 worked through it, because it wasn't like they were  
 18 severe enough. I just wanted to go and get checked  
 19 out and I thought maybe they could give me some  
 20 medicine or something for the vertigo. I was just  
 21 dizzy. I wasn't trying to get out of work. I just  
 22 wanted to know if they could give me some medicine.  
 23 Q And what happened next with regards to your  
 24 treatment for your head injury? Did you see other

1 doctors?  
 2 A I saw him, and then -- I didn't know  
 3 how you could go to heart and lung. Someone told me  
 4 that heart and lung doctors were actually better.  
 5 Actually, I was talking to Sheila Presley, Officer  
 6 Presley at the time. She was telling me that, you  
 7 know, that go to the heart and lung doctors, because  
 8 they treat you better. I said, okay, I'll go to  
 9 heart and lung.  
 10 Q So who did you see to start the heart and  
 11 lung process?  
 12 A I went back to Carroll Madden's  
 13 office and I told her that I want to do the heart  
 14 and lung. And when I got back to her office I  
 15 noticed that her treatment of me was totally  
 16 different.  
 17 Q How so?  
 18 A Just very -- well, why do you want to  
 19 do heart and lung? Which is my right. You know,  
 20 why do you want to do heart and lung, and just  
 21 very -- before Carroll, because we had -- I was a  
 22 commander as well. So we had a very good  
 23 relationship as far as me speaking to her on the  
 24 phone about officers and different things. Carroll

1 didn't really have anything to say to me at that  
 2 time. It was very -- just compared to when I first  
 3 went to her office it was totally -- the attitude  
 4 was totally different.  
 5 Q And did you go before the heart and lung  
 6 panel?  
 7 A I just need -- my throat is hurting.  
 8 I never had a arbitration hearing,  
 9 ma'am. When I first came -- I first had a hearing  
 10 for heart and lung I went and that's when Sergeant  
 11 King was a witness to what happened. At that point  
 12 they continued. That's -- right after that I was  
 13 denied my benefits. Let me take that back. I was  
 14 denied my benefits only ten days after I was on  
 15 heart and lung.  
 16 Till this day I have never had a  
 17 meeting for an appeal of heart and lung.  
 18 Q Didn't you testify at a panel?  
 19 A But that was not at a panel, ma'am.  
 20 That was just a hearing for Captain Singleton to  
 21 come down and talk about my discipline record, to  
 22 talk about why -- it was just basically he was  
 23 called there to talk about my discipline record and  
 24 why he -- I shouldn't get -- I'm sorry. Why he has

1 suspicions. That was not a panel hearing, if you  
 2 read the transcript. That was not a panel hearing.  
 3 To this day, as I stated, I've never  
 4 had a hearing in front of a panel for them to change  
 5 my IOD status. And that is something that I was  
 6 supposed to be afforded, and I never got it.  
 7 Q Did there come a time after your denial of  
 8 your heart and lung denial, did you appeal that  
 9 decision?  
 10 A I guess through -- I guess through  
 11 my -- my attorney appealed the decision or.  
 12 Q Did you appeal that decision to the Civil  
 13 Service Commission? Does that ring a bell?  
 14 A I guess my -- I guess my attorney  
 15 did. I'm not for sure on the legalities of what  
 16 happened. But I know that they -- well, I guess,  
 17 yeah, they were appealing the fact that I wasn't  
 18 on -- I wasn't being carried injured on duty.  
 19 Q Okay. So this is a short way to get to  
 20 this. Did you ever receive any heart and lung  
 21 benefits?  
 22 A I received heart and lung benefits I  
 23 think for I believe for one pay period for two  
 24 weeks, ten days.

1 Q Did you return to work?

2 A No, I didn't return to work.

3 Q Did you use your sick time and vacation time  
4 and administrative leave time?

5 A Yes.

6 Q And for how long a period did you run your  
7 time?

8 A It was from September, I believe --  
9 no, I'm sorry, October of 2008 until -- I don't know  
10 when my time was exhausted, ma'am.

11 Q Did you --

12 A I know I received a termination in  
13 like July or something of 2009, I think.

14 Q Did you ever contact Captain Singleton and  
15 indicate that you wanted to return to work?

16 A No, I'm not supposed to contact  
17 Captain Singleton to tell him I'm supposed to return  
18 to work. I'm supposed to contact the safety office.

19 Q Did you contact Carroll Madden at the safety  
20 office?

21 A No, I didn't contact her. Because my  
22 doctor, the heart and lung doctor, I was still  
23 seeing him, he had not put me back to work full  
24 duty. So I couldn't contact them and say I wanted

1 to come back to work when their own panel of doctors  
2 was saying that I shouldn't go back to work.

3 Q But you were denied benefits, correct?

4 A Yes. But just because I was denied  
5 benefits I was still injured. So I couldn't go back  
6 to work, like I said, carrying a gun and falling  
7 out. I mean, so thank goodness I was on a complaint  
8 of police when that incident happened and not on an  
9 incident when, you know, I was arresting someone.

10 Q And what was your -- I'm sorry.

11 A Go ahead.

12 Q What was your life like when you were  
13 running your time? Were you so ill that you were  
14 confined to the house? Were you treating with  
15 doctors? Tell me about that.

16 A Yes, ma'am. When I started I went to  
17 the neurologist that I was sent to through the heart  
18 and lung panel. No, let me go back. After I went  
19 to Zabeta, I was sent to Dr. Glickman.

20 Q Um-hmm.

21 A When I went to Dr. Glickman's office,  
22 when I walked in the door they knew who I was. And  
23 they stated, oh, you're Sandra Russell. You don't  
24 have an appointment with Glickman, you have an

1 appointment with Winkelman. I said, no, that's not  
2 correct. I have the information written down. So I  
3 saw Dr. Winkelman. Dr. Winkelman didn't treat me  
4 fairly, and he -- from the records that I read now,  
5 Dr. Winkelman stated that I was faking my injury.  
6 However, Dr. Winkelman continued to have me out  
7 sick. Continued -- he told me to go out sick. I  
8 was never formally told that I was denied my  
9 benefits. I was told that my benefits were denied,  
10 ma'am, through the MRI. From going to the MRI.  
11 That's how I found out. So all of these  
12 notifications, they were not made. And I had to use  
13 my Blue Cross and Blue Shield at that time.

14 Q How many doctors did you see in connection  
15 with your head injury? We stated Zabaleta. I'm not  
16 even sure if I'm saying that right.

17 MR McDUFFY: Zabaleta.

18 BY MS. SHIELDS:

19 Q Zabaleta. Glickman and Winkelman are  
20 partners and part of the panel.

21 A Um-hmm.

22 Q Did you see a Dr. Bennett or another  
23 neurologist?

24 A The first neurologist that I saw was

1 I believe Dr. Bennett at Einstein. And he gave me  
2 Topamax. But he didn't -- I don't know what his  
3 followup paperwork was.

4 Q And what were your daily activities like at  
5 this time?

6 A My daily activities weren't -- you  
7 know, it -- wait a minute. What do you mean? You  
8 mean while I was working?

9 Q No. While you're out sick are you just  
10 treating with doctors, are you home in bed? What  
11 were your daily activities like? What was your life  
12 like at that time?

13 A Because of the medication that they  
14 were prescribing me, I was basically in the house  
15 all day long.

16 Q What medications were you on?

17 A When I went to Dr. Mandel's office I  
18 was on Valium.

19 Q Valium?

20 A Yes, I was on Valium, antidepressants  
21 that stop, prevent headaches from occurring,  
22 Nortriptyline, I believe it was. That's -- well,  
23 they put you on antidepressants to stop as far as  
24 headaches. That's another use for them. It was so

1 much medication. Dr. Olga Katz was actually the  
 2 person who was treating me for the headaches. And  
 3 the headaches were so bad until I had to come in and  
 4 go to the infusion center. Now, you don't get  
 5 infusions and you don't have a headache, because  
 6 that's not good. You will have problems. But I had  
 7 to go into the infusion center and I kept a -- the  
 8 IV, I kept that in my arm for days. So I had to go  
 9 down there every day, and I had to walk to the bus  
 10 to get down there, because I had no other way of  
 11 getting there. So my injury was severe. But it  
 12 just -- it was a concussion and it just  
 13 progressively got worse. Just like people in the  
 14 NFL.

15 Q Are you currently employed, Miss Russell?

16 A Yes.

17 Q Where are you currently employed?

18 A I work for Presbyterian Children's  
 19 Village.

20 Q And tell me about, what is Presbyterian  
 21 Children's Village?

22 A It's a residential facility for  
 23 children.

24 Q And what do they do? What service do they

1 provide to these children?

2 A They provide residences for the  
 3 children. And treatment. And mental health  
 4 treatment.

5 Q Are these children are some that have been  
 6 adjudicated juveniles --

7 A Yes.

8 Q -- or having problems or?

9 A Yes.

10 Q Okay. And what do you do? What are your  
 11 exact duties? What's your title, first of all?

12 A I am a residential treatment  
 13 counselor.

14 Q And when did you get this job, Miss Russell?

15 A Earlier this year.

16 Q When you say earlier this year, can --

17 A I can't remember. January, I guess,  
 18 of 2014.

19 Q Okay. And what are your duties as a  
 20 residential treatment counselor?

21 A I basically take the girls out on  
 22 trips and just help them with different activities.  
 23 It's not a -- you know, it's not a stressful job.  
 24 You don't do a lot there.

1 Q And what are your hours like?

2 A I work from 3:00 p.m. to 11:00 p.m.

3 Q And, ma'am, what is your salary?

4 A I make 12 dollars and 57 cents an  
 5 hour.

6 Q And do you get health benefits?

7 A Yes, I do. I get health benefits.

8 Q Now, between 2009 and 2014 did you have any  
 9 other employment?

10 A Yeah, I worked at Devereux.

11 Q Okay. And --

12 A Same job.

13 Q The same type of job?

14 A Um-hmm.

15 Q As like a treatment --

16 A Um-hmm.

17 Q -- counselor?

18 A Yes.

19 Q And what was your salary? What were the  
 20 dates that you worked at Devereux, can you remember?

21 MS. SHIELDS: I think I asked for  
 22 income tax returns, too.

23 MR McDUFFY: Yeah. Okay, I'll get  
 24 them for you.

1 THE WITNESS: I think I worked in  
 2 Devereux 2012 to 2013. Yeah, 'cause I was  
 3 in -- yeah, I was in school, too.

4 BY MS. SHIELDS:

5 Q And you were also in school.

6 A Yes. Well, now I'm not, because it's  
 7 just been too stressful, ma'am. I just can't. I  
 8 just can't do school and work at the same time.

9 Q So you were at Devereux about a year,  
 10 correct?

11 A Um-hmm.

12 Q And why did you leave Devereux?

13 A I left Devereux because it was a lot  
 14 of abuse going on, I would say. That person is now  
 15 fired. But it was a lot going on at Devereux. And  
 16 I was made aware of what was going on. And when I  
 17 informed my supervisors what was going on, it became  
 18 like a -- I just didn't like the environment. I  
 19 can't say it was a, you know, it was terrible, but  
 20 it was like watch your back around her because she's  
 21 gonna tell, more or less. So but I didn't have any  
 22 problem with the people there or anything.

23 Q So did you resign?

24 A Yeah, I left. But that's -- and not

1 just because of -- I didn't resign just because of  
2 that, but it was also because of my schooling.

3 Q And then from 2013 to 2014 were you employed  
4 again? Did you get another job?

5 A 2013 I was still working at Devereux.

6 Q Right. So after Devereux then did you get  
7 the job at Presbyterian Children's Village?

8 A Yes.

9 Q Or were there any jobs in between those two?

10 A No. I can't remember, ma'am. No, I  
11 don't remember working anywhere else.

12 Q Okay.

13 A Oh. And I worked at JFK.

14 Q When you say JFK, the one in Jersey?

15 A No, the one right here around the  
16 corner on 112 North Broad Street. JFK Behavioral  
17 Health Services.

18 Q And what did you do there?

19 A I'm still actually employed there,  
20 but it's per diem and they don't have any work right  
21 now. I was a psychiatrist specialist. I handle all  
22 crisis situations in the City of Philadelphia for  
23 mental health patients.

24 Q And what do you do? Help me understand

1 schedule to work, if they have something available.

2 They haven't had anything available for quite a  
3 while now.

4 Q Now, in connection with the allegations in  
5 your complaint about sexual harassment --

6 A Yes.

7 Q -- gender discrimination, hostile work  
8 environment, retaliation, did you see any  
9 psychiatrists or psychologists?

10 A Yes, ma'am.

11 Q Tell me, and if you can, give me the dates  
12 and the doctors that you saw.

13 A First I went to EAP in the  
14 Philadelphia Police Department and I saw Officer  
15 Witted. And --

16 Q Do you know how to spell that?

17 A W-I-T-T-E-D. Exactly how it's --  
18 Witted.

19 Q Okay.

20 A And I went to him a couple of times.  
21 And then from there I had a breakdown at work  
22 September 27th, 2006.

23 Q In September 2006?

24 A Yes, ma'am.

1 more.

2 A It's a mobile emergency team. I had  
3 a partner who drove around the city, and we  
4 responded from the Office of Mental Health to people  
5 who were suicidal, police barricades, police hostage  
6 situations, and I had to basically try to diagnose  
7 the person, find out the reason for the crisis and  
8 either prepare a 302 for that person or either take  
9 them to the hospital via transportation by our  
10 vehicle 201.

11 Q And was this a permanent job?

12 A Um-hmm. But they replaced -- three  
13 of the shifts had to be replaced with medical  
14 personnel. Because it's a contract. The City's  
15 contract states that it has to be a civilian and  
16 medical personnel.

17 Q So were you essentially like laid off  
18 because of the shift?

19 A Yeah. Yeah, I was laid off. But I  
20 was able to come and work. Like they gave me a  
21 schedule of like maybe three days a week or whatever  
22 the case may be. So it just didn't work out,  
23 though. But I can always put in -- actually, I'm  
24 going to go there today. I can always put in a

1 Q Why did you have a breakdown? Tell me about  
2 your breakdown.

3 A I had -- Lieutenant Feinman had been  
4 stating things to me, such as, the only reason why  
5 you were promoted is because you're a black female  
6 and that they need black females and you're  
7 articulate. That's the only reason why I was  
8 promoted as a sergeant, according to him, because  
9 that's what they needed. I had to -- I met a quota  
10 in the police department. And any time -- if I were  
11 to tell an officer -- and it was simple things,  
12 ma'am. If I told an officer that they couldn't take  
13 off that day or they, like I said, they had to stay  
14 inside to do paperwork because the paperwork was  
15 due, they would go to the lieutenant and they went  
16 above me all the time to complain to Lieutenant  
17 Spangler and Lieutenant Feinman, but basically  
18 Lieutenant Feinman. And I told him that I did not  
19 want to meet with him anymore without someone else  
20 being there, because I was -- he would keep me in  
21 his office for the longest just badgering me over  
22 and over and over again. And...

23 I told the lieutenant, like I said,  
24 that I didn't want to meet up with him anymore. He

1 contacted me and told me to meet him in the back of  
 2 the 25th District. I was under the assumption that  
 3 the other officers was there, because it was  
 4 surveillance going on on A Street. He contacts me  
 5 and when I get there he's the only person there.  
 6 And he walks up to the car and says, you know, I  
 7 think I'm going to extend an olive branch. I don't  
 8 know what that is. I didn't know what that was at  
 9 the time. I had to figure it out. He says, I want  
 10 to extend you an olive branch, because, you know,  
 11 although you lied on Eric Dial and Officer Spicer,  
 12 you're the one that's gonna have to pay for that.  
 13 Ma'am, I just can't tell you what that did to me,  
 14 after being called those names. I mean, like as a  
 15 black female that is -- for people to call you those  
 16 kind of names, and I -- I know my history. People  
 17 died for me not to be called those types of names.  
 18 Because of your color or. It hurts. And for this  
 19 white man to stand there and say that to me it hurt  
 20 me. And it's not because he's white. My  
 21 grandmother's white. But it's because of the fact  
 22 that our history has stated that you cannot treat me  
 23 in this manner. And he's saying I'm lying about it.  
 24 So I pulled off, ma'am. I got down

1 to the surveillance and, ma'am, I just couldn't take  
 2 it no more. Everything that happened to me in the  
 3 Strike Force just flooded back and I just had an  
 4 anxiety induced asthma attack.  
 5 Q Do you have a history of asthma?  
 6 A Yes.  
 7 Q And what happened with this asthma attack?  
 8 Were you taken to the hospital?  
 9 A Yes.  
 10 Q Who took you to the hospital?  
 11 A Claudine Wood from NS, that was  
 12 assigned to Neighborhood Services.  
 13 Q Was she a police officer?  
 14 A Yes.  
 15 Q And when you got to the hospital what was  
 16 the diagnosis?  
 17 A That it was an anxiety induced asthma  
 18 attack. I was given a nebulizer and, you know, to  
 19 get myself back together. And Lieutenant Feinman,  
 20 he walked out of the hospital and told Claudine Wood  
 21 and another supervisor that was standing there, I  
 22 know I did this to her. This is -- I know that the  
 23 reason why she's in there is because of me.  
 24 How bold can you be to make that

1 kind of statement? That's not funny. Because you  
 2 know that you've harassed me so much that you know  
 3 that you're the reason why I'm in the hospital.  
 4 Q And did you stay in the hospital for any  
 5 length of time?  
 6 A No, ma'am. I asked to go. I was  
 7 released and, you know, I wasn't -- they gave me  
 8 paperwork and I asked them could I leave right then.  
 9 They told me, yes, they didn't have to hold me. And  
 10 then I got to the Narcotics Strike Force, and when I  
 11 got to the Narcotics Strike Force they had officers  
 12 to drive me home. They drove my car home.  
 13 So I went to my doctor and she  
 14 wasn't there. But I was seen by Dr. Beth Mann, and  
 15 she told me that she was not going to put me back to  
 16 work. Because I had been complaining about  
 17 depression to my doctor and the things that was  
 18 going on at work. I had been complaining to them  
 19 for a long time.  
 20 Q Were you put on antidepressants at the time,  
 21 Miss Russell?  
 22 A Yes. After the incident with  
 23 Lieutenant Feinman, yes, he put me on  
 24 antidepressants. I'm still on them.

1 Q Can you tell me the names of the  
 2 antidepressants that you were put on at this time in  
 3 2006.  
 4 A Celexa. I can't remember the  
 5 milligrams.  
 6 Q It's okay.  
 7 A And that was it at the time they put  
 8 me on. Because it's an antidepressant and it helps  
 9 with anxiety.  
 10 Q And did you go back to work or --  
 11 A No.  
 12 Q -- right back to work?  
 13 A No. I went to Belmont -- she made a  
 14 referral for me to go to Belmont Behavioral Center.  
 15 And --  
 16 Q Was that on an outpatient basis? I'm sorry  
 17 to cut you off.  
 18 A Yes, it was outpatient. And then I  
 19 went to -- I was in another -- it was another  
 20 doctor. She had a weird name. Wendy something. I  
 21 have to get her name for you. I went to her and saw  
 22 her. And I also went to Dr. Nelson, and he was a  
 23 psychiatrist and he prescribed the same medication.  
 24 Q Celexa?

1 A Yes. And he also prescribed  
2 Klonopin.

3 Q Klonopin.

4 A Yes. Only if I had like a panic  
5 attack or whatever. But I never used them. I don't  
6 like using drugs.

7 Q And in connection with your job and these  
8 allegations of harassment and hostile work  
9 environment, did you treat with any other doctors?

10 A Well, no, I just stuck with the  
11 psychiatrist and the psychologist.

12 Q And how often did you treat with them?

13 A Once a month at the time. But I  
14 couldn't go for long, because when I -- in 2006 when  
15 I was taking the medication and when I came back to  
16 work and like they were saying things about me, I'll  
17 be honest with you, I stopped taking the medication,  
18 because I just didn't want to be labeled a certain  
19 way. I like weaned myself off the medication  
20 myself.

21 Q And were you okay doing that?

22 A No, I was sick. But I know -- I knew  
23 it was -- you know, I wasn't what people were trying  
24 to make me out to be.

1 benefits kicked in and then now I'm in the process  
2 of finding a psychologist, someone that I can just  
3 talk to. Because I live by myself. I don't have  
4 anybody to talk to.

5 Q Um-hmm.

6 A I almost lost my home.

7 Q When did you almost lose your home?

8 A I had to stop making payments like in  
9 2009. It went into foreclosure, and I got on that  
10 plan with Obama. I just wouldn't leave a job,  
11 ma'am. I got a son. No amount of discipline. I  
12 had complaints before. These complaints are no  
13 different than the routine complaints that you get.

14 Q What complaints?

15 A I've had complaints before. I've  
16 always worked in a tactical unit. When you compare  
17 my record to somebody in highway patrol or somebody  
18 in narcotics you always get complaints. And if you  
19 do everything right, the first thing they're gonna  
20 say is you cursed at them. Because they don't have  
21 anything else to complain about. I've had  
22 complaints in the 25th District where my partner has  
23 given somebody a ticket. They come to the district  
24 and say I want to make a complaint on her. I never

1 Q Did you see any internists, your own  
2 internist in connection with what you were going  
3 through on the job?

4 A Well, yeah. When I went to her I  
5 told her everything that was, you know -- I told  
6 Dr. -- her name was Wineman. I told her everything  
7 that I was going through.

8 Q What is Dr. Wineman's first name, do you  
9 remember?

10 A No, I don't remember her first name,  
11 ma'am.

12 Q And did she keep you on this medication?

13 A She didn't keep me on the medication.  
14 The psychiatrist had kept me on the medication.

15 Q Are you treating with any psychiatrist or  
16 psychologist currently?

17 A I have an appointment for a new  
18 psychiatrist now. The other psychiatrist left the  
19 practice.

20 Q So when --

21 A I still take --

22 Q I'm sorry.

23 A I still take medication. So I'm just  
24 waiting to -- I started this job in January, and my

1 even talked to the people. I was the only -- when I  
2 worked in the 5 Platoon on the street for Captain  
3 Nestel, I was the only black female. Like I'm  
4 trying to tell you, I'm not using that as an excuse,  
5 but I was always identifiable.

6 Q So when's the last time you saw a  
7 psychiatrist, Miss Russell?

8 A I saw a psychiatrist last year. But  
9 I'm still on my medication, because my doctors are  
10 giving it to me.

11 Q I don't want to keep you that much longer.  
12 It's been a long, long day.

13 A I'm sorry.

14 Q I know. Can you just tell me what  
15 medications you're currently taking and for what.  
16 And then I'll stop talking to you.

17 A No, I'm fine. I take Celexa 30  
18 milligrams a day. And I take Wellbutrin 300 XL, one  
19 time a day in the morning. But that doesn't stop  
20 the hurt, ma'am.

21 My car was repossessed. I'm a  
22 prisoner in my own home.

23 Q Why are you a prisoner in your own home?

24 A Because they went out, ma'am,

1 people...

2 Q Go ahead. Just tell me.

3 A They went out and conducted all these  
4 interviews from my neighbors. I'm consistently  
5 harassed. They parked in front of my -- I couldn't  
6 get in my driveway, and then they falsified the  
7 documents. If you look at these complaints, ma'am,  
8 they're not even finished.

9 Q Um-hmm.

10 A But I'm like the laughing stock.  
11 Come out the house and calling me a thief. There's  
12 a lot of cops that live in my neighborhood. And I'm  
13 considered a thief, ma'am. I never stole anything  
14 in my life, not even a piece of gum. I've always  
15 been a church going person. I never did these  
16 things. And my character is assassinated and they  
17 just think they could do whatever they want to do to  
18 me on my block. If I come out the house, I was out  
19 there shoveling snow by myself and a man up the  
20 street who made these complaints, his wife started  
21 screaming, she's staring at me, she's staring at me.  
22 Ma'am, I can't even see that far. I can't. I can't  
23 see that far. I don't want to sit outside my house,  
24 because that's the cop that got fired. You don't

1 understand, ma'am. I'm telling you. It's all a  
2 vendetta. I didn't do these things.

3 My poor son. My son was living  
4 in -- he's a smart boy. He was in school in  
5 Delaware Valley College of Agricultural Sciences.  
6 And because I lost my job I wasn't able to afford  
7 for him to go. I had to beg for money. We didn't  
8 have enough money for him to stay in the dorm. My  
9 baby slept in his car because he didn't want to  
10 leave school. He didn't want to be a black  
11 statistic. With fumes coming in the car. He went  
12 to the bathroom at the 711 all night long. Who  
13 would leave their child to do that to their child?  
14 Nobody. Nobody.

15 Q I have no further questions for you.  
16 Just --

17 A I'm tired, ma'am.

18 Q I know you're tired.

19 A I want it to be over. I'm just tired  
20 of these people coming after me. I am tired, I  
21 really am. And I'm sorry I'm venting, but I am  
22 tired. It's over and over and over.

23 And Commissioner Ramsey doesn't know  
24 me. This man has a vendetta against me for nothing.

1 Trying to make Captain Singleton look like a choir  
2 boy. He's not. He has so many complaints against  
3 him for the same thing. But they still have their  
4 jobs.

5 I'm making 12.57 an hour trying to  
6 support myself with that. You know how many times  
7 I've been hungry? Hungry. And my house is falling  
8 apart. I had a beautiful home. My house is falling  
9 apart, because I can't get things fixed. I'm tired.  
10 I'm tired. I really am tired.

11 MR McDUFFY: Okay, that's it.

12 MS. SHIELDS: I know you are.

13 MR McDUFFY: That's enough. You're  
14 okay. You're done.

15 THE WITNESS: But they're just getting  
16 away with it for all of these years.

17 BY MS. SHIELDS:

18 Q What about?

19 A They're just getting away with what  
20 they're doing to me. That's all it is, 'cause I  
21 didn't want to join their black club of males. It's  
22 like they do whatever they want to do in the police  
23 department. These black males, they all stick  
24 together. Anytime a black female makes a complaint

1 they all stick together and bond up against us. And  
2 Commissioner Ramsey sits on the news and says  
3 anybody can make a complaint, but you back these  
4 people.

5 It's horrible, ma'am. You just  
6 don't know. Living by yourself is bad. And when  
7 you don't have nobody to talk to. Because I can't  
8 tell my mom, because my mom had three heart attacks.  
9 And my dad is a Vet struggling with post whatever it  
10 is. Post-traumatic. I can't tell him. Can't  
11 stress my son. I'm tired.

12 I lost my relationship because these  
13 people blame me for sleeping with my subordinates.  
14 How much can you take?

15 I'm sorry.

16 MS. SHIELDS: It's okay. We're done.

17 \* \* \*

18 (Witness excused.)

19 \* \* \*

20 (Whereupon, the deposition concluded  
21 at 4:45 p.m.)

22 \* \* \*

23

24



## INDEX

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WITNESS: SAUNDRA RUSSELL

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MS. SHIELDS

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## EXHIBITS

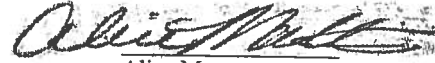
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(Exhibits D-1 and D-2 withheld by counsel.)

## CERTIFICATION

I, Alice Mattes, a Court Reporter and Notary Public, do hereby certify the foregoing to be a true and accurate transcript of the proceedings in this matter, as transcribed from the stenographic notes taken by me.



Alice Mattes  
Court Reporter  
Notary Public

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